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 U.S. DISTRICT COURT  
 SAN JUAN, P.R.

11 UNITED STATES DISTRICT COURT  
 12 DISTRICT OF THE COMMONWEALTH OF PUERTO RICO

13 Jose Ramon Cordero-Ladner, Joey 6'1"

14 Plaintiff,

15 vs.

Case No. \_\_\_\_\_

COMPLAINT FOR

16 D12, D12 Band, The Dirty Dozen, Ondre Moore,)   
 17 Swifty McVay, Rufus Arthur Johnson, Bizarre, Von)   
 18 Carlisle, Kuniva, Waverly Walter Alford III, King)   
 19 Gordy, Denaun Montez Porter, Mr. Porter, Kon)   
 20 Artis, DeShaun Dupree Holton Estate, Proof)   
 21 Estate, Warren Mitch, Top Prospect, Todd Anthony)   
 22 Shaw, Too Short, Shady Records, Marshall Bruce)   
 23 Mathers III, Eminem, Paul D. Rosenberg, Goliath)   
 24 Records, Goliath Management, Global Top)   
 25 Prospect Inc., THISisHURLEY, Michael Carter Jr.,)   
 26 Lil Wayne, Interscope Records, Universal Music)   
 Group, Interscope Geffen A&M, Universal Music)   
 Publishing Group, James D'Agostino, DJ Green)   
 Lantern, Ricore Jermaine Shelton, Ricore Shelton,)   
 23 Andre Romelle, Dr. Dre, Muse-Downey)   
 Corporation, Obie Trice III, Obie Trice, YouTube,)   
 24 Google, Shawn Corey Carter, Jay-Z, Beyoncé)   
 25 Giselle Knowles-Carter, Matrimonial Community)   
 Property between Shawn Corey Carter and)   
 26 Beyoncé Giselle Knowles-Carter, Spotify, Spotify)   
 AB, Spotify Technology S.A, CD Baby, Downtown, )

1. INFRINGEMENTS OF COPYRIGHT LAW
2. INFRINGEMENTS OF ENTERTAINMENT LAW
3. VIOLATION OF THE AUTHOR PROPERTY AND THE RIGHTS OF INTELLECTUAL LAW
4. VIOLATION AND BREACH OF CONTRACTS;
5. UNFAIR BUSINESS PRACTICES;
6. ACCOUNTING;
7. DECLARATORY RELIEF
8. INJUNCTIVE RELIEF
9. VIOLATION OF PROPERTY RIGHTS
10. VIOLATION OF HUMAN RIGHTS
11. VIOLATION OF THE DISCRIMINATION LAW AND OF US CONSTITUTION EQUAL PROTECTION ACT
12. CRIMINAL ILLEGAL APPROPRIATION

DEMAND FOR JURY TRIAL

1 AVL Digital Group, Downtown Music Publishing, )  
 2 Songtrust, Downtown Music Studios, and ASCAP, )  
 3 Distrokid and DOES 1-5 )

4 Defendants.

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 7 Plaintiff Jose Ramon Cordero-Ladner, artistic known by Joey 6'1, by and through his  
 8 attorney of record presents this complaint against Defendants: D12 (Also Known as D12 Band  
 9 and The Dirty Dozen), Ondre Moore, (Artistic Name is Swifty McVay), Rufus Arthur  
 10 Johnson, (Artistic Name is Bizarre), Von Carlisle, (Artistic name is Kuniva), Denaun Montez  
 11 Porter, (Artistic Name are Mr. Porter, Kon Artis and DeShaun Dupree) Holton Estate, (Artistic  
 12 Name is Proof Estate), Warren Mitch (Artistic Name is Top Prospect), Todd Anthony Shaw,  
 13 (Artistic Name is Too Short), Shady Records, Marshall Bruce Mathers III, (Artistic Name is  
 14 Eminem), Paul D. Rosenberg, Goliath Records, Goliath Management, Global Top Prospect Inc.,  
 15 THISisHURLEY, Michael Carter Jr., (Artistic Name is Lil Wayne), Interscope Records,  
 16 Universal Music Group, Interscope Geffen A&M, Universal Music Publishing Group, James  
 17 D'Agostino, (Artistic Name is DJ Green Lantern), Ricore Jermaine Shelton, Ricore Shelton,  
 18 Andre Romelle, (Artistic Name is Dr. Dre), Muse-Downey Corporation, Obie Trice III, (Artistic  
 19 Name is Obie Trice), YouTube, Google, Shawn Corey Carter, (Artistic Name is Jay-Z), Beyoncé  
 20 Giselle Knowles-Carter, Matrimonial Community Property between Shawn Corey Carter and  
 21 Beyoncé Giselle Knowles-Carter, Spotify, Spotify AB, Spotify Technology S.A, CD Baby,  
 22 Downtown, AVL Digital Group, Downtown Music Publishing, Songtrust, Downtown Music  
 23 Studios, ASCAP and DOES 1-5 as follows:  
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## INTRODUCTION

1. Over the past decades, millionaires and billionaire singers, artists and distribution companies have use the talent of singers, artist and composers to make plagiarism and copyright infringements of their intellectual property.
2. The Federal District Court has judicial Knowledge of the huge number of cases that are filed because of the abusive Illegal appropriation of the intellectual property that have caused violations of human rights.
3. The Defendants are major artists and singers that have fame, powerful influencers, contact opportunities, money and technology that cause abusive acts that make them Giants stepping on singers, composer and artists that are working hard to make their dream come true.
4. The Plaintiff Jose Ramon Cordero-Ladner, artistic name Joey 6'1 is a victim of the Defendants acts that have breach contracts, have made unfair business practices, plagiarizing and making copyright infringement of the song **Pimp Show** that is a song of the CD titled "Sueños y Leyendas" that is intellectual property of the Plaintiff Joey 6'1 and at the same time made and still are doing bullying and discrimination acts, comments and gestures because of his Latin ethnicity and puertorrican origin.
5. This Complaint will be a legend in history because the Plaintiff Joey 6'1 will uncover the masks to the fans of the real personalities of the Defendants and what they were and are capable to do to the Plaintiff Joey 6'1 to maintain their fame, money and glory.
6. The Defendants are responsible of Plaintiff Joey 6'1 and other singers, composers and artists with talent to be emotionally destroyed by lying to them only to make emotional and physical damage and plagiarizing their intellectual property to make more money and

1 fame. One example was when the Defendants member of D12 that the Plaintiff Joey 6'1  
2 idolize them, convince Plaintiff Joey 6'1 to change the name from Pimp Stroll to Pimp  
3 Show telling him it sound better when they were making the song and the Plaintiff Joey  
4 6'1 believe them and change the name of the song. When they made the plagiarizing of  
5 the song they use the name Pimp Stroll.  
6

7 7. We are going to unveil what they are capable to do and that the fans can see by  
8 themselves that they don't respect not even their own race and that they forget how they  
9 started in the music and the neighborhood they were race.

10 8. It is sad and sarcastic how the Defendants say that they are still of the same neighborhood  
11 they were raised but they live in a high class residence and with a fortune that made them  
12 forget the necessities they went through in their infancy and has a teenager.  
13

14 9. They make different Foundations to put a mask on their true identities but the only reason  
15 behind the Foundations is that the money is free of Tax Tribution and the donations that  
16 are made we don't know where they go.  
17

18 10. The Defendants are so powerful millionaires or billionaires that for an owner of  
19 intellectual property that emotionally is suffering is impossible to even pay an attorney to  
20 represent them.

21 11. For me is an honor to represent my brother Plaintiff Joey 6'1 because he represents a  
22 class of respectable and talented singers, composers and artist that have being  
23 emotionally traumatized by similar experiences caused by the cruel, malicious, abusive  
24 and illegal actions of the Defendants.  
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- 1 12. This Complaint will be a Legend in history because Plaintiff Joey 6'1 is going to STOP  
2 the Defendants of doing the cruel, malicious, abusive and illegal actions and we are sure  
3 that this Honorable Court will make justice.
- 4 13. In this Complaint will unveil the mask this Defendants have in front of the fans and they  
5 will see what they are capable to do and we have clear evidence of all the false positive  
6 publicity they have made to win the fans admirations and the insults they have made to  
7 the Plaintiff Joey 6'1 are really the Defendants looking at themselves in the mirror.
- 8 14. The Defendants believe in producing fear in different ways to try to STOP the Complaint  
9 but they forget that the Plaintiff Joey 6'1 is puertorrican and we don't believe in fear we  
10 believe in unity and Justice.
- 11 15. We believe that this Honorable District Court will make justice to the Plaintiff and this  
12 will be a Complaint that will inspire many others to file Complaints to fight for their  
13 rights.
- 14 16. The Defendants invited Plaintiff Joey 6'1 to Detroit so they can meet him because  
15 Plaintiff Joey 6'1 told him he was a fan, that he idolized them and obviously because he  
16 paid a big amount of money to the Defendants. The Plaintiff Joey 6'1 had a Welcome  
17 Party with all the Defendants in Detroit. (Exhibit)
- 18 17. The Defendants made a second invitation to the Plaintiff Joey 6'1 to Detroit and the  
19 Defendants had a second party with the Plaintiff Joey 6'1. In that occasion the  
20 Defendants decided that it was a good idea to film with Defendant Obie Trice a video for  
21 the song Psycho. The song and the video of Psycho was intellectual property of the  
22 Plaintiff Joey 6'1.
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1 18. The Defendant Obie Tries, the bodyguards of Defendant Obie Trice, models and the  
2 Plaintiff Joey 6'1 went to a room of a hotel of Detroit to film the video for the song  
3 Psycho. The Defendant Obie Trice have drunk to much and the way he was treating the  
4 models was disrespectful and the Plaintiff Joey 6'1 told him to stop. The Defendant Obie  
5 Trice response was to take out his gun and afterwards the Defendant Obie Trice started  
6 hitting the Plaintiff Joey 6'1 at the same time the bodyguards hitting him too. The  
7 Defendant Obie Trice didn't think it was enough by physically injuring with his  
8 bodyguard different parts of the body of the Plaintiff Joey 6'1. The Defendant Obie Trice  
9 hit the Plaintiff Joey 6'1 in the head many times with the gun and when he was going to  
10 fire the gun the models got in front of the Plaintiff Joey 6'1 and started screaming and  
11 called the security of the hotel. Joey 6'1 almost died when he was invited by the  
12 Defendants to the invitation party and they planned that defendant Obie Trice make the  
13 video of the song Psycho that same day. The Defendant Obie Trice didn't want to give  
14 what they recorded that day at the hotel of the video of Psycho that was already made  
15 before the incident. The Defendant Obie Trice dishonor the contract of the video of the  
16 song Psycho.

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20 19. The Defendant Spotify, CD Baby, YouTube, Distrokid have cause irreparable damage to  
21 the Plaintiff Joey 6'1 by stopping the publicity and making defamation saying that the  
22 Plaintiff Joey 6'1 is not a real singer and composer and saying that all his CDs were not  
23 of his property and they made accusations of copyright infringement. They disappear on  
24 the internet the name of Joey 6'1 like he was garbage.

25  
26 20. The Defendant Spotify, CD Baby, YouTube have made defamation to the Plaintiff Joey  
27 6'1 using in his emails and publicity adverse, derogatory, or unpleasant opinions with the  
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1 intention to injure reputation, to diminish the esteem, respect, goodwill, or confidence of  
2 the Plaintiff Joey 6'1.

3 21. The Defendant Spotify, CD Baby, YouTube harnessed technology to willfully infringe  
4 copyrights on a huge scale, depriving writers, composers and performers of the rewards  
5 they are owed for effort and innovation, reducing the incentives of America's creative  
6 industries, and profiting from the illegal conduct of others as well.

7  
8 22. Using the leverage of the Internet, the Defendant appropriates the value of creative  
9 content on a massive scale for Defendants benefit without payment or license. The  
10 Defendants Spotify, CD Baby, YouTube ignore and infringe the intellectual property  
11 laws and fundamentally threatens not just Plaintiff, but the economic underpinnings of  
12 one of the most important sectors of the United States economy.

13  
14 23. The Defendants actively engage in, promote, sell and induce this copyright infringement  
15 and clearly and continuously are breaching the contracts with the Plaintiff Joey 6'1. The  
16 Defendant promotes and sale the plagiarized CD Albums, songs and videos without  
17 checking if they have the copyright property.  
18

#### 19 JURISDICTION AND VENUE

20  
21 1. The jurisdiction of this Honorable Court with respect to the claims and all the  
22 Defendants in this Complaint is primary given by United States Constitution in the  
23 Article I, Section 8, Clause 8 that is the basis of intellectual property laws in the United  
24 States, specifically copyright and patent laws.  
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1 The Copyright Clause also known as the Intellectual Property Clause, Copyright and  
2 Patent Clause, or the Progress Clause describes an enumerated power listed in the United  
3 States Constitution.

4 The United States Constitution Article I, section 8, clause 8 states that: "the United States  
5 Congress shall have power: To promote the Progress of Science and useful Arts, by  
6 securing for limited Times to Authors and Inventors the exclusive Right to their  
7 respective Writings and Discoveries."

8  
9 2. The jurisdiction of this Honorable Court with respect to the claims and all the  
10 Defendants in this Complaint is also primary given by United States Constitution in the  
11 14th Amendment of the Section 1 that states:

12 All persons born or naturalized in the United States, and subject to the jurisdiction  
13 thereof, are citizens of the United States and of the State wherein they reside. No State  
14 shall make or enforce any law which shall abridge the privileges or immunities of citizens  
15 of the United States; nor shall any State deprive any person of life, liberty, or property,  
16 without due process of law; nor deny to any person within its jurisdiction the equal  
17 protection of the laws.  
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19  
20 3. The jurisdiction of this Honorable Court with respect to the claims in this  
21 Complaint and of all the Defendants is based upon 28 U.S. Code § 1332 titled Diversity  
22 of citizenship; amount in controversy; costs.

23 a) The district courts shall have original jurisdiction of all civil actions where the  
24 matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and  
25 costs, and is between citizens of different states.  
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1           4.     The jurisdiction of this Honorable Court with respect to the copyright  
2     infringement claims is based upon 28 U.S.C. § 1331 titled Federal question that states:  
3     “The district courts shall have original jurisdiction of all civil actions arising under the  
4     Constitution, laws, or treaties of the United States.”

5           5.     The jurisdiction of this Court with respect to the copyright infringement claims is  
6     also based upon 28 U.S. Code § 1338 titled Patents, plant variety protection, copyrights,  
7     mask works, designs, trademarks, and unfair competition.  
8

9           (a) The district courts shall have original jurisdiction of any civil action arising  
10    under any Act of Congress relating to patents, plant variety protection, copyrights and  
11    trademarks.  
12

13    No State court shall have jurisdiction over any claim for relief arising under any Act of  
14    Congress relating to patents, plant variety protection, or copyrights. For purposes of this  
15    subsection, the term “State” includes any State of the United States, the District of  
16    Columbia, the Commonwealth of Puerto Rico, the United States Virgin Islands,  
17    American Samoa, Guam, and the Northern Mariana Islands.  
18

19    (b)The district courts shall have original jurisdiction of any civil action asserting a claim  
20    of unfair competition when joined with a substantial and related claim under the  
21    copyright, patent, plant variety protection or trademark laws.

22    (c)Subsections (a) and (b) apply to exclusive rights in mask works under chapter 9 of title  
23    17, and to exclusive rights in designs under chapter 13 of title 17, to the same extent as  
24    such subsections apply to copyrights.  
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26    In 28 U.S. Code § 1367 titled Supplemental jurisdiction states:  
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1 (a) Except as provided in subsections (b) and (c) or as expressly provided otherwise by  
2 Federal statute, in any civil action of which the district courts have original  
3 jurisdiction, the district courts shall have supplemental jurisdiction over all other  
4 claims that are so related to claims in the action within such original jurisdiction that  
5 they form part of the same case or controversy under Article III of the United States  
6 Constitution. Such supplemental jurisdiction shall include claims that involve the  
7 joinder or intervention of additional parties.  
8

9 In 17 U.S. Code § 106 titled Exclusive rights in copyrighted works states:

10 Subject to sections 107 through 122, the owner of copyright under this title has the  
11 exclusive rights to do and to authorize any of the following:  
12

13 (1) to reproduce the copyrighted work in copies or phonorecords;

14 (2) to prepare derivative works based upon the copyrighted work;

15 (3) to distribute copies or phonorecords of the copyrighted work to the public by sale or  
16 other transfer of ownership, or by rental, lease, or lending;

17 (4) in the case of literary, musical, dramatic, and choreographic works, pantomimes, and  
18 motion pictures and other audiovisual works, to perform the copyrighted work publicly;

19 (5) in the case of literary, musical, dramatic, and choreographic works, pantomimes, and  
20 pictorial, graphic, or sculptural works, including the individual images of a motion  
21 picture or other audiovisual work, to display the copyrighted work publicly; and  
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23 (6) in the case of sound recordings, to perform the copyrighted work publicly by means  
24 of a digital audio transmission.  
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1 ZIPPO MANUFACTURING COMPANY, v. ZIPPO DOT COM, INC., Civil Action No.  
2 96-397 Erie. United States District Court, W.D. Pennsylvania. January 16, 1997, 952 F.  
3 Supp. 1119 (1997)

4 The court first described the nature of Defendant's Internet business: "Dot Com's Web  
5 site contains information about the company, advertisements and an application for its  
6 Internet news service. The news service itself consists of three levels of membership--  
7 public/free, "Original" and "Super." Each successive level offers access to a greater  
8 number of Internet newsgroups. A customer who wants to subscribe to either the  
9 "Original" or "Super" level of service, fills out an on-line application that asks for a  
10 variety of information including the person's name and address. Payment is made by  
11 credit card over the Internet or the telephone. The application is then processed, and the  
12 subscriber is assigned a password which permits the subscriber to view and/or download  
13 Internet newsgroup messages that are stored on the Defendant's server in California."

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16 Also relevant to the jurisdiction issue are the Defendant's contact with the state of  
17 Pennsylvania:

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19 "Dot Com's contacts with Pennsylvania have occurred almost exclusively over the  
20 Internet. Dot Com's offices, employees and Internet servers are located in California. Dot  
21 Com maintains no offices, employees, or agents in Pennsylvania. Dot Com's advertising  
22 for its service to Pennsylvania residents involves posting information about its service on  
23 its Web page, which is accessible to Pennsylvania residents via the Internet. Defendant  
24 has approximately 140,000 paying subscribers worldwide. Approximately two percent  
25 (3,000) of those subscribers are Pennsylvania residents. These subscribers have  
26 contracted to receive Dot Com's service by visiting its Web site and filling out the  
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1 application. Additionally, Dot Com has entered into agreements with seven Internet  
2 access providers in Pennsylvania to permit their subscribers to access Dot Com's news  
3 service. Two of these providers are located in the Western District of Pennsylvania."

4 The court decided after analyzing the traditional doctrine of personal jurisdiction  
5 relating both to the state long arm statute and the US Constitution, the court charted the  
6 precedents regarding the Internet and personal jurisdiction:

7 "Enter the Internet, a global " 'super-network' of over 15,000 computer networks used by  
8 over 30 million individuals, corporations, organizations, and educational institutions  
9 worldwide." Panavision Intern., L.P. v. Toeppen, 938 F.Supp. 616 (C.D.Cal.1996) (citing  
10 American Civil Liberties Union v. Reno, 929 F.Supp. 824, 830-48 (E.D.Pa.1996)). "In  
11 recent years, businesses have begun to use the Internet to provide information and  
12 products to consumers and other businesses." Id. The Internet makes it possible to  
13 conduct business throughout the world entirely from a desktop. With this global  
14 revolution looming on the horizon, the development of the law concerning the  
15 permissible scope of personal jurisdiction based on Internet use is in its infant stages. The  
16 cases are scant. Nevertheless, our review of the available cases and materials reveals that  
17 the likelihood that personal jurisdiction can be constitutionally exercised is directly  
18 proportionate to the nature and quality of commercial activity that an entity conducts over  
19 the Internet. This sliding scale is consistent with well-developed personal jurisdiction  
20 principles. At one end of the spectrum are situations where a defendant clearly does  
21 business over the Internet. If the defendant enters contracts with residents of a foreign  
22 jurisdiction that involve the knowing and repeated transmission of computer files over the  
23 Internet, personal jurisdiction is proper. CompuServe, Inc. v. Patterson, 89 F.3d 1257  
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1 (6th Cir.1996). At the opposite end are situations where a defendant has simply posted  
2 information on an Internet Web site which is accessible to users in foreign jurisdictions.  
3 A passive Web site that does little more than make information available to those who are  
4 interested in it is not grounds for the exercise personal jurisdiction. *Bensusan Restaurant*  
5 *Corp., v. King*, 937 F.Supp. 295 (S.D.N.Y.1996). The middle ground is occupied by  
6 interactive Web sites where a user can exchange information with the host computer. In  
7 these cases, the exercise of jurisdiction is determined by examining the level of  
8 interactivity and commercial nature of the exchange of information that occurs on the  
9 Web site. *Maritz, Inc. v. Cybergold, Inc.*, 947 F.Supp. 1328 (E.D.Mo.1996)."

10  
11 In *Sygal v. Pitsicalis*, No. 18-2730, 2018 U.S. Dist. LEXIS 194562 (S.D.N.Y. Nov. 14,  
12 2018) Court denied defendants' motion to dismiss for improper venue. Plaintiff, visual  
13 artist, brought copyright infringement claim against defendants for reproducing plaintiff's  
14 photograph from Jimi Hendrix photoshoot on commercial marijuana products and on  
15 them website and social media. Defendants moved to dismiss for improper venue, relying  
16 on general venue statute, 28 U.S.C. § 1391, ignoring that specific venue statute, § 1400,  
17 governs copyright actions. Section 1400(a) provides that venue is proper in any "district  
18 in which the defendant or his agent resides or may be found." Defendant "may be found"  
19 wherever it is amenable to personal jurisdiction. Under New York long-arm statute,  
20 personal jurisdiction is found when out-of-state defendant sells copyright-infringing  
21 products over Internet to customers in New York. Plaintiff alleged that defendants sold  
22 and shipped goods infringing his copyright into New York, meeting prima facie burden  
23 of demonstrating proper venue under C.P.L.R. § 302(a). Defendants also had "minimum  
24 contacts" with New York sufficient to comport with due process; defendants sold and  
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1 received payment in New York State for products that allegedly infringed plaintiff's  
2 copyright. Thus, defendants could reasonably have expected to be subject to suit in New  
3 York, and exercise of jurisdiction over defendants did not violate constitutional guarantee  
4 of due process.

5 Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(a) because the  
6 Defendants is subject to personal jurisdiction in this Judicial District and has committed  
7 unlawful acts of copyright infringement and other action in this Judicial District by  
8 directing its illegal activities using internet against Plaintiff Joey 6'1 that is a Puerto Rico  
9 citizen.

10 In the 28 U.S. Code § 1391 title Venue generally

11 (a) Applicability of Section. —Except as otherwise provided by law—

12 (1) this section shall govern the venue of all civil actions brought in district courts of the  
13 United States; and

14 (2) the proper venue for a civil action shall be determined without regard to whether the  
15 action is local or transitory in nature. Bristol-Myers Squibb v. Superior Court

16 (b) Venue in General. —A civil action may be brought in—

17 (1) a judicial district in which any defendant resides, if all defendants are residents of the  
18 State in which the district is located.

19 (2) a judicial district in which a substantial part of the events or omissions giving rise to  
20 the claim occurred, or a substantial part of property that is the subject of the action is  
21 situated; or



1 (3) if there is no district in which an action may otherwise be brought as provided in this  
2 section, any judicial district in which any defendant is subject to the court's personal  
3 jurisdiction with respect to such action.

4 (c) Residency. —For all venue purposes—

5 (1) a natural person, including an alien lawfully admitted for permanent residence in the  
6 United States, shall be deemed to reside in the judicial district in which that person is  
7 domiciled;  
8

9 (2) an entity with the capacity to sue and be sued in its common name under applicable  
10 law, whether or not incorporated, shall be deemed to reside, if a defendant, in any judicial  
11 district in which such defendant is subject to the court's personal jurisdiction with respect  
12 to the civil action in question and, if a plaintiff, only in the judicial district in which it  
13 maintains its principal place of business; and  
14

15 (3) a defendant not resident in the United States may be sued in any judicial district, and  
16 the joinder of such a defendant shall be disregarded in determining where the action may  
17 be brought with respect to other defendants.  
18

19 (d) Residency of Corporations in States with Multiple Districts. —

20 For purposes of venue under this chapter, in a State which has more than one judicial  
21 district and in which a defendant that is a corporation is subject to personal jurisdiction at  
22 the time an action is commenced, such corporation shall be deemed to reside in any  
23 district in that State within which its contacts would be sufficient to subject it to personal  
24 jurisdiction if that district were a separate State, and, if there is no such district, the  
25 corporation shall be deemed to reside in the district within which it has the most  
26 significant contacts.  
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1 (e) Actions Where Defendant Is Officer or Employee of the United States.—

2 A civil action in which jurisdiction of the district court is based upon section 1369 of this  
3 title may be brought in any district in which any defendant resides or in which a  
4 substantial part of the accident giving rise to the action took place.

5 In 28 U.S. Code § 1400 titled Patents and copyrights, mask works, and designs state:

6 (a) Civil actions, suits, or proceedings arising under any Act of Congress relating to  
7 copyrights or exclusive rights in mask works or designs may be instituted in the district in  
8 which the defendant or his agent resides or may be found.

9 (b) Any civil action for patent infringement may be brought in the judicial district where  
10 the defendant resides, or where the defendant has committed acts of infringement and has  
11 a regular and established place of business.

12 IN THIS COMPLAINT THIS HONORABLE COURT HAS PERSONAL  
13 JURISDICTION AND VENUE OVER ALL THE DEFENDANTS:

14 1. In this Complaint this Honorable Court has personal jurisdiction over all the  
15 Defendants by virtue of their transacting, doing, and soliciting business in this District of  
16 Puerto Rico by Internet, and because a substantial part of the relevant events occurred by  
17 email using internet and this District and because the property that is the subject of this  
18 action is situated here and in all the internet.

19 2. This Court has general personal jurisdiction over the Defendants because  
20 Defendant has continuous and systematic contacts within Puerto Rico District.

21 3. Additionally, the Defendants uses interactive app and website includes  
22 subscription-based users located in Puerto Rico.

23 THE PARTIES:

1 Plaintiff Jose Ramon Cordero-Ladner (Joey 6'1):

2 1. The Plaintiff is José Ramón Cordero-Ladner, also known by his artistic name Joey 6'1.

3 (In the Complaint is referred has Plaintiff Joey 6'1)

4 2. The Plaintiff in this moment has 32 years old and his date of birth is October 13, 1988 in  
5 the city of San Juan, Puerto Rico.

6 3. The Plaintiff moved to Arecibo, Puerto Rico on the summer of 2001 when he had 14  
7 years old and at present he is still living in Arecibo, Puerto Rico.

8 4. The Plaintiff graduated on high school with only 17 years of age. Afterwards, he studied  
9 two years of college at University Interamerican in Arecibo. He decided to stop studying because  
10 his real passion was to be a singer and composer.

11 5. The plaintiff worked as a paralegal at the law firm Lawyers Specialists in Social Security  
12 Benefits Claims and Other Federal Cases, P.S.C, also known has "Cordero, Cordero y  
13 Asociados" located in the city of Arecibo, Puerto Rico and the Plaintiff Joey 6'1 is single by  
14 divorce.

15 6. The Plaintiff is a composer, a hip-hop rapper and a reggaeton rapper in English and  
16 Spanish language.

17 7. The plaintiff created and produced a 45 songs CD album, named "Sueños y Leyendas"  
18 ("Dreams and Legends"), recorded in 2009 in which there are about 10 solo songs, and 35 songs  
19 featuring with other Puerto Rican and United States American singers. The Plaintiff is the only  
20 owner of the CD called "Sueños y Leyendas" and he is the only owner of all the songs and  
21 videos that are included in this CD. Joey 6'1 is the only owner of the copyright of the CD called  
22 "Sueños y Leyendas".  
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8. The Plaintiff is the only owner of the CD called “Sueños y Leyendas” and he is the only owner of the song Pimp Show including the track the Defendant Green Lantern sold to the Plaintiff Joey 6’1 and videos of Pimp Show that are included in this CD.

9. The plaintiff Joey 6’1 song with the following latin rappers: Maestro, Mc Ceja, Getto, Gastam, DefKnott, LG, Temperamento, Chino Nyno, Nengo Flow, Guelo Star, Mexicano 777, Bikuta #1, JKing & Maximan, Delirious, Gastam, Glory, John Erick, Wiso G, Julio Voltio, Polaco, Kenny, La Sista, Sires, Keesha y el Duende.

10. The plaintiff Joey 6’1 song with the following United States hip hop rappers: D12 Band, Swifty McVay member of D12, Obie Trice, Slautherhouse, Royce Da 5’9, Joe Budden, Joel Ortiz of Slautherhouse, Crooked Kid Vishis, Delirious, and others.

11. The plaintiff also has a CD album, titled “La Reválida” (The Bar Exam), which was released in 2019. The Plaintiff is the only owner of the CD called “La Reválida” and he is the only owner of all the songs and videos that are included in this CD. Joey 6’1 is the only owner of the copyright of the CD called “La Reválida”.

12. The plaintiff has also made singles with the main United States Hip Hop singers, such as Joe Budden, Slaughterhouse, D-12, Royce 5’ 9”, Obie Trice, Temperamento, and some other singers. The Plaintiff is the only owner of the singles and he is the only owner of all the songs and videos that are included in those singles. Joey 6’1 is the only owner of the copyright of the singles.

#### Defendants:

##### I. DEFENDANT D12

1. The Defendant D12, also known by the names D12 Band and The Dirty Dozen is an American hip hop group from Detroit, Michigan. Formed in 1996, the members of the

1 group D12 are: Defendant Eminem, Defendant Mr. Porter, Defendant Bizarre, Defendant  
2 Kuniva and Defendant Swifty McVay. The Defendant Proof Estates that benefit of all the  
3 actives of the Defendant D12.

- 4 2. The Defendant D12 released the albums Devil's Night in 2001 and D12 World in 2004.
- 5 3. The Defendant D12 had chart-topping albums in the United States, United Kingdom, and  
6 Australia during the early 2000s. The group released the albums Devil's Night in 2001  
7 and D12 World in 2004, having numerous hits such as "Fight Music", "Purple Pills", "My  
8 Band", "How Come" and "Shit on You" throughout that period. Both albums were  
9 certified double platinum by the Recording Industry Association of America. In 2004, the  
10 group won the MTV Europe Music Award for Best Hip-Hop Act.
- 11 4. The Defendant D12 debut album, Devil's Night, referring to the tradition of setting  
12 unoccupied buildings on fire the night before Halloween, was released in June 2001. It  
13 debuted at number one on the U.S. and number two on the UK chart, also reaching the  
14 top of the Canadian charts.
- 15 5. The Defendant D12 released D12 World on April 27, 2004, featuring by Defendant Dr.  
16 Dre, Defendant Eminem, Defendant Mr. Porter and Kanye West, and Defendant Obie  
17 Trice on the track "Loyalty" and B-Real of Cypress Hill on the track "American Psycho  
18 II".
- 19 6. The Defendant D12 appeared in the 2005 film The Longest Yard credited as "Basketball  
20 Convicts". For the movie, the group recorded the song "My Ballz". Although Eminem  
21 was the only D12 member not to appear in the movie, he performs the chorus and a verse  
22 in "My Ballz".
- 23
- 24
- 25
- 26
- 27
- 28

- 1 7. On December 5, 2006, Defendant Shady Records released Defendants Eminem Presents:  
2 The Re-Up which featured performances by Defendant Eminem, Defendant D12, 50  
3 Cent, Defendant Obie Trice and other artists. Some tracks were from D12 members, such  
4 as "Murder" by Defendant Bizarre and Defendant Kuniva and "Whatever You Want" by  
5 Defendant Swifty McVay and Defendant Mr. Porter. The track "Trapped" by Proof  
6 included an intro by Eminem paying his final respects saying, "Big Proof, rest in peace  
7 dudey we love you. We just want to keep making you proud."  
8
- 9 8. On May 21, 2008, the Defendant D12 released a new mixtape, Return of the Dozen Vol.  
10 1. Some tracks were solo performances from a D12 member, such as "If You Want It" by  
11 Defendant Kuniva.  
12
- 13 9. The Defendant D12 recorded a song for Eminem's album Recovery titled "Hit Me with  
14 Your Best Shot", but it was not featured on the official album. It was later featured on  
15 Eminem's mixtape Straight from the Lab Part 2 in 2011.  
16
- 17 10. The Defendant D12 released their mixtape Return of the Dozen Vol. 2 on April 12, 2011,  
18 which featured Fuzz Scoota. Fuzz Scoota was one of the original members of D12 but  
19 left in 1999. He then later joined back with Defendant D12 on April 7, 2011. Defendant  
20 Eminem was present on one track of the mixtape. In a video posted on YouTube by  
21 Defendant Eminem & Royce da 5'9" on June 13, 2011, Defendant Eminem stated that he  
22 was back in the studio with D12. The track, "Outro", off the Return of the Dozen Vol. 2  
23 mixtape, had a music video released on September 1, 2011.  
24
- 25 11. The Defendant D12 with all the members included on October 18, 2013, made the  
26 biggest mistake of their life by plagiarizing and destroying Plaintiff Joey 6'1 masterpiece.  
27 The Defendants made a copyright infringement by copying the song Pimp Show and  
28



1 changing parts of the song. The Defendants changed the name of the song maliciously to  
2 "Pimp Stroll" to fool the Plaintiff Joey 6'1. The Defendants use the part that D12 sing  
3 and the track of the song that are intellectual property of Joey 6'1 that is part of the song  
4 Pimp Show and included a part that Defendant Top Prospect sings instead of the part that  
5 the Plaintiff Joey 6'1 sings and that is not only plagiarizing they changed the song  
6 without the permission of the Plaintiff Joey 6'1 destroying the intellectual property that is  
7 an irreversible damage. The Defendant D12, the Defendants members of D12, Defendant  
8 Top Prospect and other Defendants made a CD album called Game Over that contains the  
9 song Pimp Show on October 18, 2013.  
10

11 12. The Defendants made an irreparable damage by destroying a masterpiece that is the song  
12 Pimp Show that is an intellectual property of Plaintiff Joey 6'1. Defendants illegal,  
13 abusive, cruel, malicious act of making a copyright infringement and changing the part of  
14 the song that Plaintiff Joey 6'1 sing in the song Pimp Show that Defendant change the  
15 name to Pimp Stroll is an irreparable damage. We make a comparison that changing a  
16 song is like changing a painting or a statue without permission is the same irreparable  
17 damage.  
18

19 13. We are astonished to find that throughout all these years, Plaintiff Joey 6'1 musical  
20 production did not produce any kind of income, yet the Plaintiff Joey 6'1 find out about  
21 this for the first time, when they receive CD Baby's first email related to this matter, on  
22 January 7, 2020.  
23

24 14. On August 25, 2014, a press release on Eminem's official website also revealed D12 to  
25 be featured on the label's upcoming 2-disc compilation album, titled Shady XV. The  
26  
27  
28

1 album, released on November 24, 2014, featured one greatest hits disc and one disc with  
2 new material from a variety of Shady Records recording artists including D12.

- 3 15. The Defendant D12 released a new mixtape, The Devil's Night Mixtape on October 30,  
4 2015 and it featured Lazarus, King Gordy, Royce da 5'9", Bizarre, Swifty McVay,  
5 Kuniva and Mr. Porter. It also included a freestyle by Eminem for its introduction.  
6

7  
8 II DEFENDANT SWIFTY MCVAY

- 9 1. The Defendant **Ondre Moore**, also known by Swifty McVay, is an American rapper, part  
10 of the hip hop group D12.  
11  
12 2. The Defendant Swifty Mc Vay was born on March 17, 1975 and is a rapper from Detroit,  
13 Michigan.  
14  
15 3. The Defendant Swifty McVay was accepted into D12 after Bugz was killed in 1999. He  
16 appeared in both D12's Devil's Night (2001) and D12 World (2004). He also made an  
17 appearance on Eminem's compilation album Eminem Presents: The Re-Up, on a track  
18 called "Whatever You Want" that also featured Kon Artis, released on December 5, 2006.  
19  
20 4. The Defendant Swifty McVay appear as part of D12 on Eminem's second compilation  
21 album Shady XV, on a track called "Bane".  
22  
23 5. In 2017, the Defendant Swifty McVay released his debut solo album Grey Blood on  
24 February 17, 2017.  
25  
26 6. The Defendant Swifty McVay participated singing with Plaintiff Joey 6'1 in the song  
27 Pimp Show that is one of the 45 songs of the CD album, named "Sueños y Leyendas"  
28 ("Dreams and Legends"), recorded in 2009 in which there are about 10 solo songs, and  
35 songs featuring with other Puerto Rican and United States American singers. The only

1 owner of the masterpiece that is the CD called "Sueños y Leyendas" and the only owner  
2 of all the songs and videos that are included in this CD is the Plaintiff Joey 6'1. The only  
3 owner of the track and the song Pimp Stroll is Plaintiff Joey 6'1 and is the only owner of  
4 the copyright of the CD called "Sueños y Leyendas".

- 5
- 6 7. The Defendant Swifty McVay member of D12 represented D12 in the Contracts with  
7 Plaintiff Joey 6'1 and participated in the video with Joey 6'1 that you can clearly  
8 observed the bullying and discrimination with his gestures, actions and with all he said  
9 before the making of the video, during the making of the videos and after the making of  
10 the video. The Defendant Swifty Mc Vay treated Plaintiff Joey 6'1 like he was garbage  
11 and was making fun of Plaintiff Joey 6'1 because he was latin and puertorrican. That  
12 actions of the Plaintiff Swifty Mc Vay started in the first visit of Joey 6'1 to sing Pimp  
13 Show to make the videos of the different songs they participated with Plaintiff Joey 6'1  
14 and was one of the most cruel and abusive members of D12. The Defendant Swifty  
15 McVay is an embarrassment for the hip hop rappers and to the African American race  
16 that believe in the equality of all races.
- 17
- 18 8. The Defendant Swifty McVay participated actively in the illegal plagiarize of the song  
19 Pimp Show and of the irreparable damage made to the song Pimp Show by changing the  
20 part that Joey 6'1 sings and excluded completely the Plaintiff Joey 6'1 and included a  
21 part that Defendant Top Prospect sings that is a man with history of acts of delinquency  
22 that calls himself a rapper.
- 23
- 24 9. The Defendant Top Prospect was selected by the Defendants because they knew that  
25 Defendant Top Prospect doesn't have values and respect to other singers, and he would  
26 do anything to get fame and money. The Defendant Top Prospect doesn't have voice to  
27  
28

1 sing and his participation in the song Pimp Show that is the song that is a copyright  
2 infringement of Pimp Show is an insult to the Plaintiff Joey 6'1 and of the definition of  
3 hip hop rap. The Defendant Swifty McVay and Defendant Top Prospect are clowns in a  
4 bad circus that only know how to make bullying and discrimination acts to the Plaintiff  
5 Joey 6'1 and other talented artist and singers.  
6

### 7 8 III DEFENDANT BIZZARE

- 9 1. The Defendant **Rufus Arthur Johnson**, artistic name Bizarre, was born on July 5, 1976  
10 in Detroit, Michigan.
- 11 2. The Defendant Bizarre joined the rap group Defendant D12 in 1995 with DeShaun  
12 Holton "Proof", Karnail Pitts "Bugz", Carlos Rabb "Fuzz Scoota", Willie Drake "Eye  
13 Kyu", and Defendant Von Carlisle "Kuniva". Defendant Eminem also joined D12.
- 14 3. In 2001, the Defendant Bizarre being part of Defendant D12 released their debut album,  
15 Devil's Night. In 2004, he was a part of the second studio album of Defendant D12 titled  
16 D12 World.  
17
- 18 4. The Defendant Bizarre also appeared on the 2006 Defendant Shady Records compilation  
19 album Eminem Presents: The Re-Up, on the track "Murder" along with D12 member,  
20 Kuniva.  
21
- 22 5. In 2008, Bizarre and the other members of D12 recorded their first official mixtape titled  
23 Return of the Dozen. A sequel titled Return of the Dozen Vol. 2 followed in 2011.  
24
- 25 6. The Defendant Bizarre member of D12 participated in the song Pimp Show and the video  
26 of Pimp Show that is intellectual property of the Plaintiff Joey 6'1 that was made in  
27 Detroit with the other members of D12. The Defendant Bizarre attitude towards the  
28

1 Plaintiff Joey 6'1 was always unrespectable. The Defendant Bizarre always made to the  
2 Plaintiff Joey 6'1 bullying and discrimination with his gestures, actions and with all he  
3 said before the making of the video, during the making of the videos and after the making  
4 of the video. The Defendant Bizarre treated the Plaintiff Joey 6'1 like he was garbage and  
5 was making fun of Plaintiff Joey 6'1 because he was Latin and Puerto Rican. The actions  
6 described above of the Plaintiff Bizarre started in the first visit of Joey 6'1 to sing Pimp  
7 Show to make the videos of the different songs they participated with Plaintiff Joey 6'1.  
8 The Defendant Bizarre is an embarrassment for the hip hop rappers and to the African  
9 American race that believe in the equality of all races.  
10

- 11 7. The Defendant Bizarre participated actively in the illegal plagiarize of the song Pimp  
12 Show that is intellectual property of the Plaintiff Joey 6'1 and of the irreparable damage  
13 made to the song Pimp Show by changing the part that Joey 6'1 sings and including  
14 instead the part that Top Prospect sings that is a man with history of acts of delinquency  
15 that call himself a rapper.  
16
- 17 8. In 2012, Bizarre released his fourth mixtape, titled This Guy's a Weirdo, which includes a  
18 song titled "Justin Bieber" featuring King Gordy that was released along with a music  
19 video via Reel Wolf. In the song, Bizarre fantasizes about raping and murdering  
20 Canadian singer Justin Bieber.  
21
- 22 9. In 2014, he released a song called "Pray for Me" for his upcoming album. His Lace  
23 Blunts 2 mixtape was released in March 2014, with nineteen tracks featuring guest artists  
24 such as Fuzz Scoota of their group D12, Rittz, Young Zee, Defendant King Gordy, and  
25 Big T.  
26  
27  
28

10. In August 2017, The Keepaz of the Krypt (One Man Kru & Kapital Z) single "Diaries of the Whack Emcees" feat. Bizarre of D12 was released on all digital media outlets as well as One Man Kru's bandcamp page. The song garnered over 1 million plays on SoundCloud in its first week of release.

#### IV. DEFENDANT KUNIVA

1. The Defendant **Von Carlisle**, known by his stage name Kuniva, is an American hip hop rapper. Kuniva was born December 10, 1976. He is 43 years old. He is a member of the Detroit rap group D12. **Kuniva is also known by his alter-ego Rondell Beene, and Hannz G.**

2. In 1995, Kuniva joined D12. He helped record their debut extended play The Underground EP.

3. In 2001, Kuniva worked as a member of D12 in the released of their first album Devil's Night.

4. Kuniva made appearances on albums of rappers in D12, such as Bizarre and Proof. He also appeared in Eminem's 2002 album The Eminem Show with the rest of D12 in the song "When the Music Stops".

5. Kuniva appeared on the album D12 World with D12 in 2004. During Eminem's hiatus, D12 recorded the Return of the Dozen mixtape released in 2008 while Eminem was working on Relapse. Kuniva made more appearances in songs in the mixtape of D12, taking up Eminem's place for the mixtape.

6. The Defendant Kuniva participated singing with Plaintiff Joey 6'1 in the song Pimp Show that is one of the 45 songs of the CD album, named "Sueños y Leyendas" ("Dreams and



Legends”), recorded in 2009 in which there are about 10 solo songs, and 35 songs featuring with other Puerto Rican and United States American singers. The only owner of the masterpiece that is the CD called “Sueños y Leyendas” and the only owner of all the songs and videos that are included in this CD is the Plaintiff Joey 6’1. The only owner of the track and the song Pimp Stroll is Plaintiff Joey 6’1 and is the only owner of the copyright of the CD called “Sueños y Leyendas”.

7. The Defendant Kuniva member of D12 participated in the video with Joey 6’1 that you can clearly observed the bullying and discrimination with his gestures, actions and with all he said before the making of the video, during the making of the videos and after the making of the video. The Defendant Kuniva treated Plaintiff Joey 6’1 like he was garbage and was making fun of Plaintiff Joey 6’1 because he was Latin and Puerto Rican. That actions of the Plaintiff Kuniva started in the first visit of Joey 6’1 to sing Pimp Show to make the videos of the different songs they participated with Plaintiff Joey 6’1. The Defendant Kuniva is an embarrassment for the hip hop rappers and to the African American race that believe in the equality of all races.

8. The Defendant Kuniva participated actively in the illegal plagiarize of the song Pimp Show and of the irreparable damage made to the song Pimp Show by changing the part that Joey 6’1 sings and excluded completely the Plaintiff Joey 6’1 and included a part that Defendant Top Prospect sings that is a man with history of acts of delinquency that calls himself a rapper.

9. On February 16, 2010, Kuniva released his digital mixtape called D12's Own Kuniva Presents: Retribution...The Mixtape. The mixtape featured Defendant Bizarre, Kon Artis, and a rapper by the name of Beez.

1        10. On April 12, 2011, Defendant D12 released Return of the Dozen Pt. 2 which was the  
2 sequel mixtape of Return of the Dozen in 2008. Defendant Kuniva also had solo parts on this  
3 mixtape.

4        11. In 2011, he released his Mixtape Midwest Marauders Vol.1, which was followed by  
5 Midwest Marauders 2 in 2012.  
6

7        12. In 2014, he released the album A History of Violence. In 2016, he released the sequel, A  
8 History of Violence 2.  
9

10        V. DEFENDANT MR. PORTER ("KON ARTIS")  
11

12        1. The Defendant **Denaun Montez Porter** was born on December 7, 1974, also known by the  
13 stage names Mr. Porter and Kon Artis.

14        2. The Defendant Mr. Porter is an American rapper, singer, composer, and music producer.

15        3. The Defendant Mr. Porter is member of Detroit hip-hop group D12.

16        4. The Defendant Mr. Porter has an association with Defendant Eminem, often appearing on his  
17 tours and has produced for other notable artists such as 50 Cent, Royce da 5'9", The Game,  
18 Method Man, Snoop Dogg, Jadakiss and more.  
19

20        5. The Defendant Mr. Porter started his career with D12 in the mid-1990s.

21        6. The Defendant Mr. Porter was introduced to Defendant Eminem by the D12 member Eye Kyu  
22 back in 1995.

23        7. The Defendant Mr. Porter throughout his solo career, he has both produced and performed  
24 vocally as a rapper and singer, producing songs for many notable artists such as Defendant  
25 Eminem, Busta Rhymes, Snoop Dogg, Royce da 5'9" and 50 Cent. The Defendant Mr. Porter  
26 produced the 2003 song "P.I.M.P."  
27  
28

1 **8. The Defendant Mr. Porter is also officially signed to Defendant Eminem's label**  
2 **Defendant Shady Records as a producer and has worked with Defendant Shady Records**  
3 **artists Slaughterhouse, Bad Meets Evil, 50 Cent and Defendant D12. Defendant Mr. Porter**  
4 **is now most notably seen as a hype man in Eminem's live shows, replacing D12 member**  
5 **Proof who died in 2006.**  
6

7 9. The Defendant Mr. Porter was a co-executive producer, with Defendant Eminem and Royce  
8 da 5'9", for Bad Meets Evil's debut EP Hell: The Sequel.

9 10. The Defendant Mr. Porter also has an appearance in their music video "Fast Lane", as well as  
10 "Forever" by Drake featuring Kanye West, Defendant Lil Wayne and Defendant Eminem, and  
11 Eminem's single "No Love" featuring Defendant Lil' Wayne and then in 2013 he featured in  
12 Defendant Eminem's "Rap God" video alongside other members of Slaughterhouse. In 2020 he  
13 featured in the music video of Defendant Eminem's single "Godzilla".  
14

15 11. The Defendant Mr. Porter contributed a verse to the song "Bane" on the Shady Records  
16 compilation album, Shady XV, released on November 24, 2014.

17 12. The Defendant Mr. Porter appeared on D12's The Devil's Night Mixtape.  
18

19 13. The Defendant Mr. Porter participated with Plaintiff Joey 6'1 in the song Pimp Show that is  
20 one of the 45 songs of the CD album, named "Sueños y Leyendas" ("Dreams and Legends"),  
21 recorded in 2009 in which there are about 10 solo songs, and 35 songs featuring with other  
22 Puerto Rican and United States American singers. The only owner of the masterpiece that is the  
23 CD called "Sueños y Leyendas" and the only owner of all the songs and videos that are included  
24 in this CD is the Plaintiff Joey 6'1. The only owner of the track and the song Pimp Stroll is  
25 Plaintiff Joey 6'1 and is the only owner of the copyright of the CD called "Sueños y Leyendas".  
26  
27  
28

1 14. The Defendant Mr. Porter participated actively in the illegal plagiarize of the song Pimp  
2 Show and of the irreparable damage made to the song Pimp Show by changing the part that Joey  
3 6'1 sings and excluded completely the Plaintiff Joey 6'1 and included a part that Defendant Top  
4 Prospect sings that is a man with history of acts of delinquency that calls himself a rapper.  
5

6  
7 VI DEFENDANT PROOF ESTATE

- 8 1. The Defendant is **DeShaun Dupree Holton Estate**, known professionally as Proof  
9 Estate.  
10  
11 2. Proof was born on October 2, 1973 and died on April 11, 2006.  
12  
13 3. Proof was an American rapper and actor from Detroit, Michigan. During his career, he  
14 was a member of the group Defendant D12. He was a close childhood friend of the  
15 Defendant Eminem, who also lived in Detroit, Michigan.  
16  
17 4. Proof was often a hype man at Eminem's concerts.  
18  
19 5. Proof first rose to national prominence as a part of the rap group D12, a hip-hop group he  
20 was instrumental in forming.  
21  
22 6. In 2000, Proof toured with Defendant Eminem, Defendant Dr. Dre, Ice Cube, and Snoop  
23 Dogg in the Up In Smoke Tour, performing as a hype man for Defendant Eminem.  
24  
25 7. Proof gained further exposure in 2001 with the release of Devil's Night, D12's debut  
26 album on Defendant Interscope Records. The following year, Proof collaborated with  
27 Dogmatic on "Promatic" and joined Defendant Eminem's "Anger Management" tour in  
28 support of the release.
8. Proof appeared in the film 8 Mile along with Defendant Eminem and Xzibit. Proof  
appeared as Lil' Tic, a freestyle rapper who rap battles the lead character, B-Rabbit,

1 played by Defendant Eminem. To capitalize on the publicity from the film, Proof  
2 released a six-song EP called Electric CoolAid: Acid Testing.

3 9. Proof also starred in a cameo role, alongside the rest of Defendant D12 (except for  
4 Eminem), in The Longest Yard, appearing as "Basketball Convicts".

5 10. Proof released a solo album featuring collaborations with 50 Cent, Method Man, Nate  
6 Dogg, B-Real of Cypress Hill, T3 of Slum Village, Obie Trice, King Gordy, Eminem and  
7 D12.  
8

9 11. Proof also recorded a track, "How I Live," with Twiztid for their album Independents  
10 Day shortly before his death. Besides these, he recorded during his Gold Coast tour in  
11 2006, which was exactly two weeks before his death, a song with "Liquidsilva".  
12

13 12. On April 11, 2006, Proof was shot three times, once in the head and twice in the chest,  
14 after a dispute broke out during a game of billiards on 8 Mile Road in Detroit, Michigan.  
15 A pool game between Proof and Keith Bender turned into a heated argument and then  
16 escalated into a physical altercation. Etheridge, who was Bender's cousin, fired a warning  
17 shot into the air. There have been many conflicting reports about Proof and Keith  
18 Bender's roles in the shooting, but it was reported that Proof then shot Bender in the head  
19 during the altercation. Bender was not immediately killed by the gunshot but died a week  
20 later from his injuries. In response to Proof shooting Bender, Etheridge then shot Proof  
21 three times, once in the head and twice in the chest, killing him at the scene. A few weeks  
22 after both men's death, Bender's family began a death suit against Proof's estate.  
23

24 13. The Defendant Proof Estate is monetizing every time D12 receives illegally a  
25 compensation because they participated singing with Plaintiff Joey 6'1 in the song Pimp  
26 Show that is one of the 45 songs of the CD album, named "Sueños y Leyendas"  
27  
28

1 (“Dreams and Legends”), recorded in 2009 in which there are about 10 solo songs, and  
2 35 songs featuring with other Puerto Rican and United States American singers. The only  
3 owner of the masterpiece that is the CD called “Sueños y Leyendas” and the only owner  
4 of all the songs and videos that are included in this CD is the Plaintiff Joey 6’1. The only  
5 owner of the track and the song Pimp Stroll is Plaintiff Joey 6’1 and is the only owner of  
6 the copyright of the CD called “Sueños y Leyendas”.  
7

8 14. The Defendant Proof Estate is monetizing because D12 participated actively in the illegal  
9 plagiarize of the song Pimp Show and of the irreparable damage made to the song Pimp  
10 Show by changing the part that Joey 6’1 sings and excluded completely the Plaintiff Joey  
11 6’1 and included a part that Defendant Top Prospect sings that is a man with history of  
12 acts of delinquency that calls himself a rapper. They are selling the song in all the internet  
13 and D12 is receiving money and Proof Estate also because he was part of D12.  
14  
15

## 16 VII DEFENDANT TOP PROSPECT

- 17 1. The Defendant **Warren Mitch**, also known by his artistic name Top Prospect, is a  
18 Detroit hip hop rapper.  
19
- 20 2. The Defendant Top Prospect is the American hip hop rapper that Defendants D12 and  
21 other Defendants use to substitute Plaintiff Joey 6’1 in the song Pimp Stroll.  
22
- 23 3. The Defendant Top Prospect maliciously use the song Pimp Show that the Plaintiff Joey  
24 6’1 is the owner of the song and the owner of the track of the song.  
25
- 26 4. The Defendant Top Prospect without authorization of the Plaintiff Joey 6’1 substitute the  
27 Plaintiff Joey 6’1 in the song titled Pimp Stroll and the video of the song that is  
28



1 plagiarizing the son of the Plaintiff Joey 6'1 called Pimp Show. The Plaintiff Top  
2 Prospect action are a clear copyright infringement that created irreparable damage.

3 5. The first CD Defendant Top Prospect ever owned was Digital Underground "Sex  
4 Packets".

5 6. The Defendant Top Prospect got in a lot of trouble as a kid and adolescent and was  
6 kicked out of high school.

7 7. Around the year 2000 the Defendant Top Prospect worked at a car wash in the south end  
8 of Warren MI. Almost directly on the corner of 8 Mile and Van Dyke.

9 8. One day he was cleaning a car out and it turned out to be Eminem's. The Defendant Top  
10 Prospect was the only person allowed to clean Defendant Eminem vehicles for many  
11 years and was in good terms with Eminem.

12 9. The Defendant Top Prospect even got to shine up a white Yukon that left his hands and  
13 went right into the "Lose Yourself" video shoot.

14 10. The Defendant Top Prospect also met Proof from D12.

15 11. The Defendant Top Prospect was charged with criminal offenses in different occasions  
16 and was in and out of jail for different criminal cases.

17 12. However, Defendant Top Prospect got his GED and later went to college for audio  
18 engineering and was part of recording with Defendant D12.

19 13. He heard online that Defendant D12 was accepting submissions from artists and sent in  
20 his only track which had called "It's About To Go Down".

21 14. The Defendant Top Prospect was contacted by D12s management saying that he was  
22 given a green light to make tracks with Defendant D12.

1 15. The Defendant Top Prospect started making music with D12 including the plagiarized  
2 song Pimp Stroll in the CD Game Over. All the members of D12 played a huge part in  
3 shaping his style. They started working in the studio together and shows.  
4

5  
6 VIII TOO SHORT

- 7 1. The Defendant **Todd Anthony Shaw** was born on April 28, 1966, better known by the  
8 stage name Too Short (stylized as Too \$hort), is an American rapper and record producer.  
9  
10 2. The Defendant Too Short became famous in the West Coast hip hop scene in the early  
11 90s, with lyrics often based on pimping and promiscuity, but also drug culture and street  
12 survival.  
13  
14 3. Defendant Too Short grew up in Los Angeles, California. In the early 1980s, Defendant  
15 Too Short and his family moved to Oakland, California  
16  
17 4. With his 1989 release, Life Is...Too Short, he began using replayed his eleventh album,  
18 Can't Stay Away. The album included guest appearances by 8Ball & MJG, Jay-Z,  
19 Jermaine Dupri, Sean Combs, E-40, Daz Dillinger, Lil Jon, Soopafly, Scarface and B-  
20 Legit.  
21  
22 5. In 2004, his earlier 1990 single "The Ghetto" appeared on popular video game Grand  
23 Theft Auto: San Andreas, playing on West Coast hip hop radio station Radio Los Santos.  
24 Given that this was an incredibly popular game at the time, the featuring was acclaimed  
25 as a success for Too Short, both in publicity and in the fame generated by the song.  
26  
27 6. For his next album, Blow the Whistle in 2006, Too Short was a rapper. Too Short as it  
28 peaked at #14 on the Billboard 200, much better than each of his previous three releases.

7. In 2012 Too Short along with E-40 released two collaboration albums on the same day titled History: Mob Music and History: Function Music. Both charted in the top 100 on the Billboard 200 albums chart.
8. Too Short released his 20th album The Pimp Tape on November 9, 2018. On December 20, 2019 he released his 21st album The Vault.
9. Too Short made an appearance in Jay-Z's video for the hit single Big Pimpin'.

#### IX DEFENDANT SHADY RECORD

1. **The Defendant Shady Records is an American record label founded in 1999 by Defendant Eminem and his manager Defendant Paul D. Rosenberg, after the release of Eminem's The Slim Shady LP. Both serve as the label's presidents.**
2. Since its formation, Shady Records has also been part of the business venture in Shade 45 radio station via Sirius Satellite Radio and had its own dedicated special edition magazine via XXL magazine.
3. The Defendant Shady Record was part of the successful international Anger Management tours and, in 2006, released an album showcasing on Eminem Presents: The Re-Up. Shady Record was contracted for putting together the soundtrack to the Eminem-starring film 8 Mile, which had the lead single "Lose Yourself". The song went on to be the first ever song in the hip hop genre to receive an Academy Award for Best Original Song.
4. The Defendant Shady Record signed acts include or included Defendant Eminem and while former acts include Defendant D12 and Defendant Obie Trice.

- 1 5. After Eminem released The Slim Shady LP, he started his own record label in late  
2 1999 called Shady Records. Defendant Eminem recorded Defendant D12 with his  
3 own record label called Defendant Shady Records and with Defendant Interscope.
- 4 6. Defendant D12 was the first to be signed on Defendant Shady Records as they had  
5 been rapping together since the 1990s. In June 2001, D12 released Devil's Night,  
6 peaking at #1 on the Billboard 200.
- 7 7. Obie Trice was introduced to Eminem through D12's Bizarre. Eminem signed him in  
8 June 2001 as the second Shady Record act.
- 9 8. D12 released the second album, D12 World in 2004. In 2004, Shady Records, Eminem  
10 and Rosenberg began in the Sirius Satellite Radio their uncensored hip hop radio station,  
11 Shade 45.
- 12 9. Shady Record DJ was and/or is DJ Green Lantern and he was given his own show.
- 13 10. The Defendant Shady Records is the record label of Defendant D12, Defendant  
14 Obie Trice and Defendant DJ Green Lantern and for that reason they are  
15 responsible for all the actions that the Defendant D12 and Defendant Green  
16 Lanterns made or makes in the future. They are responsible of the plagiarizing, the  
17 copyright infringement and all other actions contrary to the US Contitution and to  
18 the Law of the United States of America that the Defendants have made and makes  
19 to the Plaintiff Joey 6'1.
- 20 11. The Defendant Shady Record is the record label and record company that is a  
21 brand or trademark of music recordings and music videos made by the Defendants  
22 D12, Defendant DJ Green Lantern and Defendant Obie Trice and the company that  
23 owns it.

12. The Shady Record was part of the making and of all the actions of the Defendants that cause the copyright infringements, the plagiarizing, the breach of contracts, the discrimination acts, the violation of human rights and the irreparable damage made to the intellectual property of the Plaintiff Joey 6'1 and the physical and emotional damage cause to the Plaintiff Joey 6'1.

13. The Defendant Shady Records is a record label that also is a publishing company that manages such brands and trademarks, coordinates the production, manufacture, distribution, marketing, promotion, and enforcement of copyright for sound recordings and music videos, while also conducting talent scouting and development of new artists and maintaining contracts with recording artists and their managers. Within the mainstream music industry, recording artists have traditionally been reliant upon record labels to broaden their consumer base, market their albums, and promote their singles on streaming services, radio, and television. Record labels also provide publicists, who assist performers in gaining positive media coverage, and arrange for their merchandise to be available via stores and other media outlets.

#### X. DEFENDANT EMINEM

1. Marshall Bruce Mathers III, also known professionally as Eminem, is an American rapper, songwriter, and record producer.
2. After his debut album Infinite (1996) and Slim Shady EP (1997), Eminem signed with Dr. Dre's Aftermath Entertainment and subsequently achieved mainstream popularity in 1999 with The Slim Shady LP. His next two releases The Marshall

1 Mathers LP (2000) and The Eminem Show (2002) were worldwide successes and were  
2 both nominated for the Grammy Award for Album of the Year. After the release of his  
3 next album, Encore (2004).

- 4 3. Eminem returned to the music industry four years later with the release of Relapse  
5 (2009), and Recovery was released the following year. Recovery was the best-selling  
6 album worldwide of 2010, making it Eminem's second album, after The Eminem Show in  
7 2002, to be the best-selling album of the year worldwide. In the following years, he  
8 released the US number one albums The Marshall Mathers LP 2, Revival, Kamikaze and  
9 Music to Be Murdered By.
- 10 4. Eminem owns Shady Records, with manager Paul Rosenberg.
- 11 5. He has also established his own channel, Shade 45, on Sirius XM Radio.
- 12 6. In addition to his solo career, Eminem is a member of the hip hop group D12.
- 13 7. Eminem is among the best-selling music artists of all time, with estimated worldwide  
14 sales of more than 220 million records. He was the best-selling music artist in the United  
15 States of the 2000s and the best-selling male music artist in the United States of the  
16 2010s, third overall.
- 17 8. The Marshall Mathers LP, The Eminem Show, "Lose Yourself", "Love the Way You  
18 Lie" and "Not Afraid" have all been certified Diamond or higher by the Recording  
19 Industry Association of America.
- 20 9. Rolling Stone included him in its lists of the 100 Greatest Artists of All Time and the  
21 100 Greatest Songwriters of All Time.
- 22 10. Defendant Eminem has won numerous awards, including 15 Grammy Awards, eight  
23 American Music Awards, 17 Billboard Music Awards, an Academy Award and an MTV  
24  
25  
26  
27  
28

1 Europe Music Global Icon Award. He has had ten number one albums on the Billboard  
2 200, which all consecutively debuted at number one on the chart making him the only  
3 artist to achieve this, and five number-one singles on the Billboard Hot 100.

4 11. Defendant Eminem released The Slim Shady LP in February 1999. Although it was one  
5 of the year's most popular albums, he was accused of imitating the style and subject  
6 matter of underground rapper Cage. The album's popularity was accompanied by  
7 controversy over its lyrics; in '97 Bonnie and Clyde" Eminem describes a trip with his  
8 infant daughter when he disposes of his wife's body, and in "Guilty Conscience" which  
9 encourages a man to murder his wife and her lover.

10 12. The first single from the album, "The Real Slim Shady", was a success despite  
11 controversies about Eminem's insults and dubious claims about celebrities (for example,  
12 that Christina Aguilera had performed oral sex on Fred Durst and Carson Daly).

13 13. The Eminem Show was released in May 2002. It was another success, reaching number  
14 one on the charts and selling over 1.332 million copies during its first full week. The  
15 album's single, "Without Me", denigrates boy bands, Limp Bizkit, Dick and Lynne  
16 Cheney, Moby and other.

17 14. On December 8, 2003, the United States Secret Service said that it was "looking into"  
18 allegations that Defendant Eminem had threatened the President of the United States. The  
19 cause for concern was the lyrics of "We As Americans" ("Fuck money / I don't rap for  
20 dead presidents / I'd rather see the president dead / It's never been said, but I set  
21 precedents"), which was later released on a bonus CD with the deluxe edition of Encore.

22 15. On December 8, 2003, the United States Secret Service reported that it was "looking  
23 into" allegations that Defendant Eminem threatened U.S. President George W. Bush in  
24



1 "We As Americans", with the lyrics: "Fuck money, I don't rap for dead presidents. I'd  
2 rather see the president dead, it's never been said but I set precedents." The incident was  
3 included in the video for "Mosh", as a newspaper clipping on a wall with articles about  
4 unfortunate incidents in Bush's career. "We As Americans" eventually appeared on  
5 Encore's deluxe-edition bonus disc, with altered lyrics.

6  
7 16. In February 2017, Eminem appeared on "No Favors", a track from Big Sean's album I  
8 Decided. In the song, Eminem calls the newly elected President Donald Trump a "bitch",  
9 and raps about raping conservative social and political commentator Ann Coulter, who is  
10 a Trump supporter, with a variety of foreign objects.

11  
12 17. The Secret Service interviewed Eminem again regarding threatening lyrics towards  
13 President Donald Trump and daughter Ivanka.

14 18. Defendant Eminem was the executive producer of D12's first two albums (Devil's Night  
15 and D12 World), Obie Trice's Cheers and Second Round's on Me and 50 Cent's Get Rich  
16 or Die Tryin' and The Massacre. He also has produced songs for other rappers.

17  
18 19. On June 3, 2000, Eminem was arrested during an altercation with Douglas Dail at a car-  
19 audio store in Royal Oak, Michigan, when he pulled out an unloaded gun and pointed it  
20 at the ground. The next day, in Warren, Michigan, he was arrested again for assaulting  
21 John Guerra in the parking lot of the Hot Rock Café when he saw him kissing his wife.  
22 Eminem recreated the Guerra assault in "The Kiss (Skit)" on The Eminem Show. He  
23 pleaded guilty to possession of a concealed weapon and assault, and received two years'  
24 probation; however, Guerra's assault charge was dropped as part of the plea agreement.

25  
26 20. On July 7, 2000, Kim attempted suicide by slashing her wrists, and later sued Eminem for  
27 defamation after describing her violent death in "Kim".  
28

- 1 21. On June 28, 2001, Eminem was sentenced to one year's probation and community service  
2 and was fined about \$2,000 on weapon charges stemming from an argument with an  
3 employee of Psychopathic Records.
- 4 22. On March 31, 2002, French jazz pianist Jacques Loussier filed a \$10 million lawsuit  
5 against Eminem and Dr. Dre, claiming that the beat for "Kill You" was taken from his  
6 instrumental "Pulsion". Loussier demanded that sales of The Marshall Mathers LP be  
7 halted, and any remaining copies destroyed. The case was later settled out of court.
- 8 23. In October 2013, Eminem sampled Chicago-based rap group Hotstylz's 2008 viral hit,  
9 "Lookin' Boy", for his 2013 hit single "Rap God". The group claims that Eminem did not  
10 receive permission to use the sample, nor did he credit or compensate them. In November  
11 2013, Hotstylz released a diss track towards Eminem titled "Rap Fraud", where they  
12 sample several of his songs and criticize him for not crediting them. In January 2015,  
13 TMZ reported that Hotstylz was suing Eminem and his label, Shady Records, for \$8  
14 million, for using the 25 second sample of "Lookin' Boy" on his song "Rap God", without  
15 their permission.
- 16 24. Following Eminem's multiplatinum record sales, Interscope offered him his own label; he  
17 and Paul Rosenberg founded Shady Records in late 1999. Eminem signed his Detroit  
18 collective, D12, and rapper Obie Trice to the label and signed 50 Cent in a 2002 joint  
19 venture with Dr. Dre's Aftermath label. DJ Green Lantern, Eminem's former DJ, was with  
20 Shady Records.
- 21 25. D12 reunited in 2004 for their second album, D12 World, which included the hit singles  
22 "My Band" and "How Come". "American Psycho 2" featuring Cypress Hill member, B-  
23 Real, was another popular hit.
- 24  
25  
26  
27  
28

1 26. In January 2014, Bass Brothers announced that D12 had returned to record at F.B.T.  
2 Studio and they were working on an album with Eminem on at least three songs. Bizarre  
3 reported that he was still part of the group and that the album was scheduled for a 2014  
4 release.  
5

6  
7 XI. DEFENDANT PAUL D. ROSENBERG

- 8 1. Paul D. Rosenberg was born August 1, 1971 and is an American music manager, current  
9 CEO of Goliath Records and former CEO of Def Jam Recordings, best known for his  
10 association with hip hop artist Defendant Eminem.  
11  
12 2. In addition to being a manager of several music acts, the Defendant Rosenberg, along  
13 with Defendant Eminem, is also the co-founder of hip hop record label Defendant Shady  
14 Records, which was founded in 1999.  
15  
16 3. Defendant Rosenberg first became involved with Defendant Eminem in 1997, during the  
17 recording of the Slim Shady EP.  
18  
19 4. Defendant Rosenberg is a co-producer for Eminem's hip-hop radio station Shade 45,  
20 which is channel 45 on SiriusXM satellite radio.  
21  
22 5. Defendant Rosenberg became manager of New York City rapper Action Bronson in late  
23 2012, getting him signed to Vice Records and then to his own management firm Goliath  
24 Artists.  
25  
26 6. In 2016, the Defendant Rosenberg and Action Bronson along with Vice created the TV  
27 series Fuck, That's Delicious, for which Defendant Rosenberg acts as the executive  
28 producer.

1 7. On August 1, 2017, the Defendant Rosenberg was appointed Chairman and CEO of Def  
 2 Jam Recordings, succeeding the current CEO, Steve Bartels. The transition took place in  
 3 2018.

4 8. February 21st, 2020, Defendant Paul Rosenberg stepped down on his position as  
 5 president in Def Jam and announced the formation of Defendant Goliath Records, a  
 6 joint venture label with Defendant Universal Music Group.  
 7

8  
 9 XII. DEFENDANT GOLIATH MANAGEMENT, also known as Goliath Records:

- 10 1. Goliath Artists is an American talent firm that manages mostly hip-hop artists and acts,  
 11 most known for being the management house of rapper Eminem and D12.  
 12  
 13 2. It is run by Shady Records president/co-founder, executive producer and attorney Paul  
 14 Rosenberg.  
 15  
 16 3. Paul Rosenberg is Chairman and CEO of Goliath Management.  
 17

18 XIII. DEFENDANT GLOBAL TOP PROSPECT

- 19 1 The Defendant Global Top Prospect Inc (GTP) is a corporation that conglomerate  
 20 music artists and labels such as Top Prospect, THISisHURLEY and Redrum  
 21 Productions. The corporation is responsible for all the acts of the Defendants Top  
 22 Prospect, THISisHURLEY, and other Defendants.  
 23  
 24 2 The Defendant Top Prospect is the CEO and CoFounder of GTP, 'Global Top  
 25 Prospects Inc.'  
 26  
 27 3 The Defendant THISisHURLEY - CoFounder of GTP, 'Global Top Prospects Inc.'  
 28

XIV. DEFENDANT INTERSCOPE RECORD

**The Defendant Interscope Records Corporation is an American record label owned by Defendant Universal Music Group through its Interscope Geffen A&M imprint.**

Founded in late 1990 by Jimmy Iovine and Ted Field joint venture with Atlantic Records of Warner Music Group.

In 1992, Interscope acquired the exclusive rights to market and distribute releases from the hardcore hip hop label Death Row, whose artists included Dr. Dre and Snoop Dogg.

**In 1996, 50% of the label was acquired for a reported \$200 million by MCA Inc., later known as Universal Music Group.**

**Interscope is based in Santa Monica, California.**

**Interscope has rights to market and distribute Eminem.**

**Interscope has rights to market and distribute the D12 Band and many of the members of the band.**

**Interscope has rights to market and distribute Madonna, Billie Eilish, Gwen Stefani, Imagine Dragons, Summer Walker, Kendrick Lamar, Lady Gaga, Lana Del Rey, Maroon 5, Selena Gomez, and U2.**

In May 1995, the controversy related to gangsta rap and explicit lyrics intensified as U.S. Senate Majority Leader Bob Dole accused Interscope of releasing music that glorified violence and degraded women. Among others, the label was criticized by William J. Bennett, a former Education Secretary, and C. DeLores Tucker, the chairwoman of the National Political Congress of Black Women. In September of

1 1995, Time Warner announced it would disassociate itself from Interscope by selling  
2 its half-interest in the company to Field and Iovine for \$115 million.

3 10 In February 1996, MCA Records—then owned by Seagram—bought 50% of  
4 Interscope for a reported \$200 million. Under the agreement, Interscope retained  
5 complete creative control over the label's recordings.  
6

7 11 Dr. Dre in 1996 founded Aftermath Entertainment, a new joint venture with  
8 Interscope. In November that same year, Aftermath debuted with the album Dr. Dre  
9 Presents the Aftermath.

10 12 In 1996, MCA Music Entertainment was renamed Universal Music Group. In  
11 1998, the Universal Music Group parent company Seagram acquired PolyGram  
12 Records.  
13

14 13 In February 1999, Interscope and Aftermath released The Slim Shady LP of  
15 Eminem. The album entered the charts at number two and won two Grammy  
16 Awards. Later in 1999 Eminem and his manager, Paul Rosenberg, founded  
17 Shady Records.  
18

19 14 Interscope and Shady Records released Eminem's The Marshall Mathers LP on  
20 May 23, 2000.

21 15 Interscope and Shady Records released The Eminem Show, in May 2002 and  
22 the soundtrack for Eminem's semi-autobiographical film 8 Mile in October; the  
23 two titles combined sold more than 11,000,000 records before the end of the  
24 year.  
25

26 16 In February 2003, Shady Records, Aftermath and Interscope had another  
27 record-breaking hit with Get Rich or Die Tryin', the debut album by 50 Cent.  
28

17 In November 2003, Universal Music Group acquired DreamWorks Records and  
 18 in 2004 it was merged into Interscope Geffen A&M.

19 In June 2010 Eminem's Recovery entered the Billboard 200 at number one, his sixth  
 20 album to do so.

21 Several artists have criticized Interscope for delaying albums.

22 In September 2011, it was allegedly reported by federal prosecutors that the  
 23 Interscope Geffen A&M Records building was used by a drug-trafficking ring as a  
 24 transport center. The Drug Enforcement Administration inspected the year-long case  
 25 and stated that the Los Angeles offices of Interscope Records were used for pickups  
 26 and deliveries of hundreds of kilograms of cocaine in 2010 and 2011. Rock-It Cargo,  
 27 a shipping company which has an immense list of musical clients, shipped music  
 28 cases that allegedly contained drugs to New York City studios.

#### XV. DEFENDANT UNIVERSAL MUSIC PUBLISHING GROUP

1. The Defendant Universal Music Publishing Group is a Music Industry, and the  
 headquarters are in Santa Monica, California, U.S. The area served is worldwide.
2. Universal Music Publishing Group is a North American music publishing company and is  
 part of the Universal Music Group, a subsidiary of Vivendi and Tencent. It was formerly  
 known as MCA Music Publishing until it merged with PolyGram.
3. Universal Music Publishing is the world's second largest music publishing company,  
 behind Sony/ATV Music Publishing. Universal Music Publishing Group catalogue  
 consists of over three million songs, with offices in over 30 countries.



XVI. DEFENDANT DJ GREEN LANTERN

1. The Defendant James D'Agostino was born on July 7, 1975, professionally known as DJ Green Lantern, is an American hip hop disc Jockey (DJ) and music producer from Rochester, New York. In 2002, D'Agostino was signed by American rapper Eminem, to become the official DJ for Shady Records.
2. The Defendant DJ Green Lantern has a signature brand of mixtapes.
3. The Defendant Shady Records released the mixtapes of DJ Green Lantern.
4. The Defendant DJ Green Lantern is also recognized as a producer.
5. The Defendant DJ Green Lantern sold to the Plaintiff Joey 6'1 the music track that was use for the song Pimp Show. The Contract clearly stated that Defendant Green Lantern sold the exclusivity of the tract to Plaintiff Joey 6'1. The Defendant Green Lantern sold the intellectual property that was the track that was use in the Song Pimp Show to the Plaintiff Joey 6'1.
6. The Defendant DJ Green Lantern maliciously, abusive, cruel an illegally breach the contract with the Plaintiff Joey 6'1 and sold the track to the Defendants D12, D12 members, Eminem, Top Prospect, Global Top Prospect and other Defendant to produce the song Pimp Stroll. The Defendant DJ Green Lantern act is an infringement of copyright Law, an illegal appropriation of intellectual property of Plaintiff Joey 6'1 that created irreparable damage by destroying the Intellectual Property of Plaintiff Joey 6'1.
7. The Defendant DJ Green Lantern maliciously, abusive, cruel an illegally breach the contract with the Plaintiff Joey 6'1 and sold the track to the Defendants Jay Z, Defendant Beyonce, Defendant Matrimonial Estate of Jay Z and Beyonce and other

Defendants to produce the song Pimp Stroll (ft. Lil Wayne and Dante Hawkins)  
mixtape entitled "Creative Control". The Defendant DJ Green Lantern act is an  
infringement of copyright Law, an illegal appropriation of intellectual property of  
Plaintiff Joey 6'1 that created irreparable damage by destroying the Intellectual  
Property of Plaintiff Joey 6'1.

8. The Defendant DJ Green Lantern produced D-Block's "2 Guns Up", which originated as a freestyle rap on his Hot 97 radio show.
9. "In the Lab" is formatted as a mix show, in which the Defendant DJ Green Lantern blends tracks from various artists, as well as breaking new and underground music.
10. The Defendant DJ Green Lantern also produced Ludacris' "Number One Spot," the second single from his album The Red-Light District, and Immortal Technique's "Bin Laden" single, which blames the Reagan Doctrine and U.S. President George W. Bush for the September 11, 2001 attacks.
11. As a member of the Shady Records, D'Agostino also hosted a show on Eminem's Sirius Satellite Radio channel, Shade 45, along with an accompanying mixtape released in the fall of 2004.
12. As Eminem's DJ, D'Agostino was responsible for touring with him and spinning at shows such as the Shady National Convention and The Game's album release party.
13. Together with Mister Cee he is featured as host of the hip-hop radio station "The Beat 102.7" in the video game Grand Theft Auto IV. Instead of using existing songs, Green Lantern produced the songs exclusively for "The Beat 102.7".

XVII. DEFENDANT RICORE SHELTON

1. The Defendant Ricore Jermaine Shelton was born 1971 and is listed at 5860 Plum Hollow Dr Apt 10 Ypsilanti, Mi 48197.
2. The Defendant is in the industry of Entertainment and other actions that are part of the Music Industry.
3. The Defendant Ricore Shelton is the owner of MUSE DOWNEY CORPORATION.
4. The Defendant Ricore Shelton is the incorporator of MUSE DOWNEY CORPORATION.
5. The Defendant Ricore Shelton is the responsible of the events for MUSE - DOWNEY CORPORATION.
6. The Defendant Ricore Shelton is the agent of MUSE DOWNEY CORPORATION.

#### XVIII. DEFENDANT MUSE-DOWNEY CORPORATION

- 1 The Defendant Muse-Downey Corporation is an industry of entertainment.
- 2 The Defendant Muse-Downey Corporation was incorporated on 8 June 2010.
- 3 The Defendant Muse-Downey Corporation was incorporated by the Defendant Ricore Shelton.
- 4 The Defendant Muse-Downey Corporation is active at present and the company number 1942202 and the company type is a Corporation for Profit.
- 5 The Agent Address is 1150 SALT SPRINGS RD #43, LORDSTOWN, OH, 44481.
- 6 **The Defendant Muse Downey Corporation is artist Manager of D12, Kuniva, Swifty Mcvay, Top Prospect, Proof Estate, Diff Jones and others.**
- 7 **The Defendant State of Muse is a hip-hop label.**

8 Based in Detroit, the label has included D12, D12 members like Kuniva, Swifty  
2 Mcvay, Top Prospect and others.

3 9 Collectively, Federation Records has sold over 100,000 units nationwide becoming  
4 one of critic's favorite hip hop labels, garnering positive press in magazines like the  
5 Source, URB, Rap Sheet, Under Ground Soundz, Metro Times, Real Detroit Weekly,  
6 The Village Voice and Vibe.  
7

8 XIX DEFENDANT DR. DRE:

9 1 The Defendant Andre Romelle Young was born February 18, 1965, known  
10 professionally as Dr. Dre, is an American rapper, record producer, audio engineer, record  
11 executive, and entrepreneur.  
12

13 2 The Defendant Dr. Dre is the founder and CEO of Aftermath Entertainment and Beats  
14 Electronics.

15 3 On January 27, 1991, at a music industry party at the Po Na Na Souk club in Hollywood,  
16 Dr. Dre assaulted television host Dee Barnes of the Fox television program Pump it Up,  
17 following an episode of Pump It Up where her interview with NWA had been followed  
18 by an interview with Ice Cube in which he dissed NWA and mocked The D.O.C.'s  
19 change in voice after a near-fatal accident. Barnes filed a \$22.7 million lawsuit in  
20 response to the incident. Subsequently, Dr. Dre was fined \$2,500, given two years'  
21 probation, ordered to undergo 240 hours of community service, and given a spot on an  
22 anti-violence public service announcement on television. The civil suit was settled out of  
23 court.  
24  
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28

1 4 Dr. Dre pleaded guilty in October 1992 in a case of battery of a police officer and was  
2 convicted on two additional battery counts stemming from a brawl in the lobby of the  
3 New Orleans hotel in May 1991.

4 5 On January 10, 1994, Dr. Dre was arrested after leading police on a 90 mph pursuit  
5 through Beverly Hills in his 1987 Ferrari. It was revealed Dr. Dre had a blood-alcohol of  
6 0.16, twice the state's legal limit. The conviction violated Dre's battery conviction in 1991  
7 and he was sentenced to eight months in prison in September 1994.

8 6 In 1996, Dr. Dre left Death Row Records to establish his own label, Aftermath  
9 Entertainment. He produced a compilation album, Dr. Dre Presents the Aftermath, in  
10 1996, and released a solo album.

11 7 During the 2000s, Defendant Dr. Dre focused on producing other artists, occasionally  
12 contributing vocals.

13 8 **Defendant Dr. Dre signed Eminem, D12 and 50 Cent and co-produced their albums.**

14 9 Dr. Dre has also had acting roles in movies such as Set It Off, The Wash and Training  
15 Day.

16 10 Defendant Dr. Dre has won six Grammy Awards, including Producer of the Year; Non-  
17 Classical.

18 11 In 2015, Michel'le, the mother of one of his children, accused him of domestic violence  
19 during their time together as a couple. Their abusive relationship is portrayed in her 2016  
20 biopic Surviving Compton: Dre, Suge & Michel'le.

21 12 Lisa Johnson, the mother of three of Dr. Dre's children, stated that he beat her many  
22 times, including while she was pregnant. She was granted a restraining order against him.  
23  
24  
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26  
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28

1 13 Former labelmate Tairrie B claimed that Dr. Dre assaulted her at a party in 1990, in  
2 response to her track "Ruthless Bitch".

3 14 Defendant Dr. Dre was involved in several lawsuits. Lucasfilm Ltd., the film  
4 company behind the Star Wars film franchise, sued him over the use of the THX-  
5 trademarked "Deep Note".

6  
7 15 The Fatback Band also sued Dr. Dre over infringement regarding its song  
8 "Backstrokin'" in his song "Let's Get High" from the 2001 album; Dr. Dre was  
9 ordered to pay \$1.5 million to the band in 2003.

10 16 French jazz musician Jacques Loussier sued Aftermath for \$10 million in March  
11 2002, claiming that the Dr. Dre-produced Eminem track "Kill You" plagiarized his  
12 composition "Pulsion".

13  
14 17 Following the success of 2001, Dr. Dre focused on producing songs and albums for  
15 other artists. He co-produced six tracks on Eminem's landmark Marshall Mathers  
16 LP, including the Grammy-winning lead single, "The Real Slim Shady". The album  
17 itself earned a Grammy and proved to be the fastest-selling rap album of all time,  
18 moving 1.76 million units in its first week alone.

19  
20 18 Dr. Dre was the executive producer of Eminem's 2002 release, The Eminem Show.  
21 He produced three songs on the album, one of which was released as a single, and he  
22 appeared in the award-winning video for "Without Me".

23  
24 19 Another copyright-related lawsuit hit Dr. Dre in the fall of 2002, when Sa Re Ga  
25 Ma, a film and music company based in Calcutta, India, sued Aftermath  
26 Entertainment over an uncredited sample of the Lata Mangeshkar song "Thoda  
27 Resham Lagta Hai" on the Aftermath-produced song "Addictive" by singer Truth  
28

Hurts. In February 2003, a judge ruled that Aftermath would have to halt sales of Truth Hurts' album Truthfully Speaking if the company would not credit Mangeshkar.

20 Defendant Dr. Dre was the second-richest figure in hip hop as of 2018 with an estimated net worth of \$800 million.

#### XX DEFENDANT OBIE TRICE

1. The Defendant Obie Trice III born November 14, 1977, is an American rapper and songwriter.
2. Obie Trice signed with Shady Records and was part of the rappers that appear in different CD of Eminem and D12.
3. He does not use a rap name like most rappers, instead using his birth name on stage.
4. Obie Trice III was born and raised on the west side of Detroit, Michigan. By the age of fourteen, he was attending rap battle gatherings around Detroit, including the Hip Hop Shop. The battles were hosted by Proof, from D12.
5. Obie Trice was introduced to Eminem through D12 member Bizarre.
6. Obie Trice signed to Shady Records in 2000. Obie Trice was part of the D12 album Devil's Night, following up with an intro in Eminem's The Eminem Show lead single "Without Me", as well as the song "Drips".
7. Later in 2002, Trice rapped on songs for the 8 Mile soundtrack, and had a cameo appearance in the film as a rapper in a parking lot.
8. Obie Trice's debut album, Cheers, was released on September 23, 2003. The album, Cheers, consists of 17 tracks with production from Eminem, Dr. Dre, Timbaland, Mike



1 Elizondo, Emile, Fredwreck and Mr. Porter. Artists featured on Cheers include Busta  
2 Rhymes, Eminem, 50 Cent, Lloyd Banks, Dr. Dre, Nate Dogg, D12, Tony Yayo, and  
3 Timbaland. The album was eventually certified platinum by the RIAA.

4 9. On December 31, 2005, Trice's car was shot 6 times while driving on the Lodge  
5 Expressway by Wyoming Avenue in Detroit. One of the bullets hit him in the head. Obie  
6 Trice was able to drive off the expressway, where his girlfriend waved down the police.  
7 He was taken to Providence Hospital and released later that day. Doctors contemplated  
8 whether or not to remove the bullet. As it was too dangerous to operate, the bullet is still  
9 lodged in his skull.  
10

11 10. Obie Trice second album, entitled Second Round's on Me. The album was released on  
12 August 15, 2006. Following the release of Second Round's on Me, he released a mixtape  
13 called Bar Shots with G-Unit's DJ Whoo Kid.  
14

15 11. On April 5, 2011, another street single from Trice was released, called "Learn to Love".  
16 Although some of the lyrics were changed, it was just a remixed version of his song titled  
17 "Haters" from his "Bar Shots" mixtape.  
18

19 12. On April 13, 2011, Obie Trice released a music video for his song "Keep me/Love me."

20 13. On April 3, 2012 Bottoms Up was released. On May 7, 2012, just over a month after the  
21 album's release, Trice released a new song from his upcoming mixtape The Hangover  
22 titled "Get Rich Die Tryin" featuring Bilal.

23 14. On June 15, 2015, Obie Trice released the first single "Good Girls" from his then-  
24 upcoming album The Hangover, which was released on August 7, 2015. The track was  
25 produced by the Grammy award-winning producer Magnedo7, who was one of the  
26 producers of Eminem's seventh studio album, Recovery.  
27  
28

1 15. On August 23, 2019, his fifth album simply named The Fifth was released.

2 16. On December 10, 2019, Obie Trice released a diss track called "Spanky Hayes" against  
3 Nick Cannon to defend Eminem after Nick Cannon released 2 diss tracks against  
4 Eminem. In the diss track, Trice was rapping over the instrumental of "30 Something" by  
5 Jay-Z.  
6

7 17. On December 6, 2019, Obie Trice was arrested for shooting his girlfriend's son.

8 18. On July 8th, 2020, Trice was sentenced to 90 days in the Oakland County Jail in  
9 Michigan from charges related to the December 2019 shooting.  
10

11 XXI DEFENDANT JAY Z:  
12

13 1. The Defendant Shawn Corey Carter was born on December 4, 1969, known  
14 professionally as Jay-Z, is an American rapper, songwriter, record executive,  
15 businessman, and record producer. He is widely regarded as one of the most  
16 influential hip-hop artists in history, and often cited as one of the greatest rappers of  
17 all time.  
18

19 2. Born and raised in New York City, Jay-Z first began his musical career after founding the  
20 record label Roc-A-Fella Records in 1995, and subsequently released his debut studio  
21 album Reasonable Doubt in 1996.

22 3. He has gone on to release twelve additional albums, including the acclaimed albums,  
23 The Blueprint (2001), The Black Album (2003), American Gangster (2007), and 4:44  
24 (2017).  
25

26 4. Jay-Z has also released the full-length collaborative albums Watch the Throne (2011)  
27 with Kanye West and Everything Is Love (2018) with his wife Beyoncé, respectively.  
28

- 1 5. Jay-Z has also attained significant success and media attention for his career as a  
2 businessman.
- 3 6. In 1999, he founded the clothing retailer Rocawear, and in 2003, he founded the luxury  
4 sports bar chain 40/40 Club. Both businesses have grown to become multi-million-dollar  
5 corporations.
- 6 7. On December 1, 1999, Jay-Z, who had come to believe that record executive Lance "Un"  
7 Rivera was behind the bootlegging of Vol. 3..., stabbed Rivera at the release party for Q-  
8 Tip's album Amplified at the Kit Kat Klub, a now-defunct night club in Times Square,  
9 New York City. Jay-Z's associates at the party were accused of causing a commotion  
10 within the club, which Jay-Z allegedly used as cover while he stabbed Rivera in the  
11 stomach with a five-inch (127 mm) blade. He surrendered to police the following evening  
12 and was placed under arrest, although he was soon released on \$50,000 bail. When he  
13 was indicted in Manhattan Criminal Court in late January 2000, he pleaded not guilty; he  
14 and his lawyers contended that they had witnesses and videotapes proving he had been  
15 nowhere near Rivera during the incident. Nevertheless, he later pleaded guilty to third-  
16 degree assault and accepted a three-year probation sentence.
- 17 8. Jay-Z is the owner of the entertainment company Roc Nation, which was founded in  
18 2008.
- 19 9. In 2015, he acquired the tech company Aspiro and took charge of their media streaming  
20 service Tidal.
- 21 10. Jay-Z is one of the world's best-selling music artists, with over 50 million albums and 75  
22 million singles sold worldwide. He has won a total of 22 Grammy Awards, the most by a  
23 rapper, and holds the record for the most number-one albums by a solo artist on the  
24  
25  
26  
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1 Billboard 200, with 14. He has been ranked by Billboard and fellow music publication  
2 Rolling Stone as one of the 100 Greatest Artists of All Time.

3 11. In 2017, he became the first rapper to be honored into the Songwriters Hall of Fame, and  
4 in 2018, received the commemorative "Salute to Industry Icons" award at the 60th  
5 Grammy Awards.

6  
7 12. In June 2019, Jay-Z officially became the first hip hop billionaire, making him the fifth-  
8 wealthiest African American and the wealthiest American musician.

9 13. On June 6, 2018, Jay-Z and Beyoncé kicked-off the On the Run II Tour in Cardiff,  
10 United Kingdom. Ten days later, at their final London performance, the pair unveiled  
11 Everything Is Love, their much-awaited joint studio album, credited under the name The  
12 Carters. The pair also released the video for the album's lead single, "Apeshit", on  
13 Beyoncé's official YouTube channel. The song won two awards from eight nominations  
14 at the 2018 MTV Video Music Awards.

15  
16 14. Jay-Z serves as co-brand director for Budweiser Select and collaborates with the  
17 company on strategic marketing programs and creative ad development. He provides  
18 direction on brand programs and ads that appear on TV, radio, print, and high-profile  
19 events.  
20

21 15. In 2002, Jay-Z and singer Beyoncé collaborated on the song "'03 Bonnie & Clyde". He  
22 also appeared on Beyoncé's hit single "Crazy in Love" as well as "That's How You Like  
23 It" from her debut album Dangerously in Love. On her second album, B'Day, he made  
24 appearances on the hits "Déjà Vu" and "Upgrade U".  
25

26 16. Beyoncé and Jay-Z were listed as the most powerful couple for Time magazine's 100  
27 most influential people of 2006. In January 2009, Forbes ranked them as Hollywood's  
28

1 top-earning couple, with a combined total of \$162 million. They made it to the top of the  
2 list the following year, with a combined total of \$122 million between June 2008 and  
3 June 2009.

4  
5  
6 XXII DEFENDANT BEYONCE

- 7 1. The Defendant Beyoncé Giselle Knowles-Carter; born September 4, 1981 is an American  
8 singer, actress and record producer. Born and raised in Houston, Texas.
- 9 2. The Defendant Beyonce debut album Dangerously in Love in 2003 featured four  
10 Billboard Hot 100 top five songs, including the number-one singles "Crazy in Love"  
11 featuring rapper Jay-Z and "Baby Boy" featuring singer-rapper Sean Paul.
- 12 3. The Defendant Beyonce released her second solo album, B'Day, which contained her first  
13 US number-one solo single "Irreplaceable", and "Beautiful Liar", which topped the charts  
14 in most countries.
- 15 4. The Defendant Beyoncé has an acting career with starring roles in The Pink Panther  
16 (2006), Dreamgirls (2006), and Obsessed (2009).
- 17 5. **The Defendant Beyonce marriage to Defendant Jay-Z on April 4, 2008.**
- 18 6. The Defendant Beyonce released her third album, I Am... Sasha Fierce (2008), which  
19 earned a record-setting six Grammy Awards in 2010. It made the UK number-one single  
20 "If I Were a Boy", the US number-one single "Single Ladies (Put a Ring on It)" and the  
21 top five single "Halo".
- 22 7. The Defendant Beyoncé released the album 4 (2011), Beyoncé (2013) and Lemonade  
23 (2016); the latter was the world's best-selling album of 2016 and the most acclaimed  
24 album of her career, exploring themes of infidelity and womanism.
- 25  
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- 1 8. In 2018, she released Everything Is Love, a collaborative album with her husband, Jay-Z,  
2 as the Carters.
- 3 9. The Defendant Beyoncé topped the Billboard Hot 100 with the remixes of "Perfect" by  
4 Ed Sheeran in 2017 and "Savage" by Megan Thee Stallion in 2020. The same year, she  
5 made her directorial and screenwriting debut with the musical film and visual album  
6 Black Is King, which received widespread critical acclaim after premiering on Disney+.
- 7 10. The Defendant Beyoncé is one of the world's best-selling recording artists, having sold  
8 118 million records worldwide.
- 9 11. The Defendant Beyonce success during the 2000s was recognized with the Recording  
10 Industry Association of America's Top Certified Artist of the Decade, as well as  
11 Billboard magazine's Top Radio Songs Artist and the Top Female Artist of the Decade.
- 12 12. The Defendant Beyoncé is the most nominated woman in the Grammy Award's history  
13 and has the second most wins for a woman with a total of 24. She is also the most  
14 awarded artist at the MTV Video Music Awards, with 24 wins, including the Michael  
15 Jackson Video Vanguard Award.
- 16 13. In 2014, the Defendant Beyonce became the highest-earning Black musician in history  
17 and was listed among Time's 100 most influential people in the world for a second year  
18 in a row.
- 19 14. Forbes ranked her as the most powerful female in entertainment on their 2015 and 2017  
20 lists.
- 21 15. The Defendant Beyonce occupied the sixth place for Time's Person of the Year in 2016  
22 and in 2020, was named one of the 100 women who defined the last century by the same  
23 publication.
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1  
2 XXIII DEFENDANT MATRIMONIAL COMMUNITY PROPERTY OF JAY Z AND  
3 BEYONCE  
4

- 5 1. The Defendant Beyonce marriage to Defendant Jay-Z on April 4, 2008.  
6

7 XXIV DEFENDANTS DANTE HAWKIN  
8

- 9 1 The Defendant Dante Hawkin has several musical arenas including Hip Hop, R&B,  
10 Neo-Soul, Pop and Gospel.

- 11 2 Dante Hawkins has worked with super producers Devonte Swing, Missy Elliot,  
12 Timberland, P. Diddy, Mario Winans, Scott Storch and others. He has shared the  
13 stage with Erykah Badu, Dru Hill, Ginuwine and Tyrese. He has recorded with Jay-Z,  
14 Lil Wayne, Jadakiss, Juelz Santana, and Joel Ortiz, who also gave Dante the  
15 opportunity to record the #5 song for President Obama on Billboard.

- 16 3 The Defendant DJ Green Lantern produced the tracks of Dante Hawkin.

- 17 4 The Defendant Dante Hawkin is originally from Rochester, New York and currently  
18 reside in New York City.

- 19 5 The song with Lil Wayne & Jay Z "Pimp Stroll" was put together by DJ Green  
20 Lantern.  
21

22  
23 XXV DEFENDANT LIL WAYNE

- 24 1 Defendant Dwayne Michael Carter Jr. was born on September 27, 1982, better known by  
25 his stage name Lil Wayne, is an American rapper, singer, songwriter, record executive,  
26 entrepreneur, and actor. He is regarded by many contemporaries as one of the most influential  
27 hip hop artists of his generation, and often cited as one of the greatest rappers of all time.  
28



1     2     The Defendant career began in 1995, at the age of 12, when he was signed by rapper  
2 Birdman, joining Cash Money Records as the youngest member of the label.

3     3     The Defendant Lil Wayne was artist of Cash Money Records, before ending his  
4 association with the company in June 2018.

5     4     The Defendant Lil Wayne's solo debut album Tha Block Is Hot (1999) and he reached  
6 higher popularity with his fourth album Tha Carter (2004) and fifth album Tha Carter II (2005),  
7 as well as several mixtapes and collaborations throughout 2006 and 2007.

8     5     The Defendant Lil Wayne gained more prominence within the music industry with his sixth  
9 album Tha Carter III on 2008, with first-week sales of over one million copies in the US. The  
10 album won the Grammy Award for Best Rap Album and included successful singles "Lollipop",  
11 "A Milli" and "Got Money".

12     6     The Defendant Lil Wayne rock-influenced album titled Rebirth was released in 2010.

13     7     In March 2010, the Defendant Lil Wayne began serving an 8-month jail sentence in New  
14 York after being convicted of criminal possession of a weapon stemming from an incident in  
15 July 2007.

16     8     The Defendant Lil Wayne eighth studio album I Am Not a Human Being (2010) was  
17 released during his incarceration, while his 2011 album Tha Carter IV was released following his  
18 release. The album Tha Carter IV sold 964,000 copies in its first week in the United States.

19     9     The Defendant Lil Wayne twelfth studio album Tha Carter V was released in 2018 and  
20 the thirteenth album, Funeral, was released in early 2020.

21     10.    The Defendant Lil Wayne has sold more than 120 million records worldwide, including  
22 more than 15 million albums and more than 37 million digital tracks in the United States, making  
23 him one of the world's best-selling music artists.  
24  
25  
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11 The Defendant Lil Wayne has won five Grammy Awards, 11 BET Awards, four  
Billboard Music Awards, two MTV Video Music Awards and eight NAACP Image Awards.

12 On September 27, 2012, the Defendant Lil Wayne became the first male artist to surpass  
Elvis Presley with the most entries on the Billboard Hot 100, with 109 songs.

13 **The Defendant Lil Wayne also currently serves as the Chief Executive Officer**  
**(CEO) of his own label, Young Money Entertainment.**

14 On April 24, 2020, Lil Wayne along with Dash Radio, launched his own radio show,  
Young Money Radio, on Apple Music.

15 In December 2019, Carter announced his own cannabis brand under the name of GKUA  
Ultra Premium.

16 On July 22, 2007, Carter was arrested in New York City following a performance at the  
Beacon Theatre; the New York City Police Department discovered Carter and another man  
smoking marijuana near a tour bus. After taking Carter into custody, police discovered a .40  
caliber pistol near his person. The gun, which was registered to his manager, was in a bag located  
near the rapper. He was charged with criminal possession of a weapon and marijuana.

17 On January 23, 2008, Carter was arrested alongside two others. His tour bus was stopped  
by Border Patrol agents near Yuma, Arizona. A K-9 Unit recovered 105 grams (3.7 oz) of  
marijuana, almost 29 grams (1.0 oz) of cocaine, 41 grams (1.4 oz) of ecstasy, and \$22,000 in  
cash. Carter was charged with four felonies: possession of narcotic drug for sale, possession of  
dangerous drugs, misconduct involving weapons and possession of drug paraphernalia. He was  
granted permission to travel outside of the state and remain out of custody on the \$10,185 bond  
he posted.

1 On May 6, 2008, Carter returned to court in Arizona to plead not guilty to the charges. A bench  
2 warrant was issued on March 17, 2010 when Carter did not show for a final trial management  
3 conference. However, the rapper was already incarcerated, serving a one-year sentence in Rikers  
4 Island on weapons charges. On June 22, 2010, Carter pleaded guilty to the charges. As part of  
5 the plea deal, he was able to serve 36 months of probation, which he was sentenced to on June  
6 30, 2010.  
7

8 On December 18, 2009, Carter and 11 others were detained at the Falfurrias, Texas border patrol  
9 checkpoint after an unknown amount of marijuana was found on two of his tour buses.

10 On October 22, 2009, Carter pleaded guilty to attempted criminal possession of a weapon. He  
11 was due for sentencing in February 2010 and was expected to receive a one-year county jail  
12 sentence, but on February 9, 2010, Carter's attorney announced that the sentencing was delayed  
13 until March 2 due to dental surgery, which was performed on February 16. The surgery included  
14 eight root canals, the replacement of several tooth implants, as well as the addition of a few new  
15 implants and work on his remaining original teeth. On March 2, 2010, sentencing was postponed  
16 again when the courthouse reported a fire in the basement.  
17

18 On March 8, 2010, Carter was given a one-year sentence, which he served in Rikers Island. His  
19 lawyer said the rapper expected to be held in protective custody, separated from other prisoners.

20 In May 2010, Carter was found by Rikers Island correctional staff to be in possession of  
21 contraband (an MP3 player, charger, and headphones). In April 2010, Carter's friends created a  
22 website called Weezy Thanx You, which publishes letters written by Carter while incarcerated.  
23

24 Carter was released from Rikers Island Jail on November 4, 2010 after serving eight months of  
25 his year-long sentence.  
26  
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28

1 On July 24, 2008, Abkco Music Inc filed a lawsuit against Carter for copyright  
2 infringement and unfair competition, specifically referring to Tha Carter III's track  
3 "Playing with Fire". In the lawsuit, Abkco says that the song was obviously derived from  
4 The Rolling Stones' "Play with Fire", to which Abkco owns the rights. Subsequently,  
5 "Playing with Fire" was removed from the track list of Tha Carter III on all online music  
6 stores and replaced with the David Banner produced track, "Pussy Monster".

7  
8 In February 2009, production company RMF Productions filed a \$1.3 million lawsuit  
9 against Carter, following a \$100,000 advance payment for three shows, all of which were  
10 cancelled by the artist.

11 In October 2009, Carter, Birdman, Cash Money Records, and various music distribution outlets  
12 were sued for copyright infringement by Thomas Marasciullo, who says his voice was used  
13 without permission.  
14

15 In March 2011, producer Deeze (Darius Harrison) sued Carter and his parent labels Cash Money  
16 Records over unpaid royalties from Tha Carter III.

17 In May 2011, producer Bangladesh also filed a lawsuit against Weezy & Co. over unpaid  
18 royalties as well.  
19

20 In early June 2011, another producer named David Kirkwood filed a lawsuit against Young  
21 Money Entertainment and Cash Money Records on claims that the labels have failed to pay him  
22 over \$1.5 million in royalties and production services for his work on the album, also including  
23 his songwriting on "Love Me or Hate Me", a bonus song featured only on the deluxe edition of  
24 the album.  
25  
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1 In June 2011, Dallas producers Play-N-Skillz filed a lawsuit against him, saying Carter owes  
2 them at least \$1 million in unpaid royalties for "Got Money" from his album Tha Carter III. The  
3 single has sold over 2 million copies since being released.

4 In July 2011, Done Deal Enterprises, a production company based in Georgia, filed suit against  
5 Carter, Universal Music Group, Cash Money Records and Young Money Entertainment,  
6 claiming copyright infringement. The lawsuit alleges Carter stole the song "BedRock", featured  
7 on the compilation album We Are Young Money, and seeks damages of \$15 million.  
8

9  
10 XXVIII DEFENDANT CD BABY

11 CD Baby, Inc. is an online distributor of independent music.

12 CD Baby is the digital aggregator with partner status with both Spotify and Apple Music.

13 CD Baby is an online distributor of more or less 650,000 artists and 9 million tracks that are  
14 made available to over 100 digital services and platforms around the globe.

15 The defendant CD Baby, as of 2018, **operates out of Portland, Oregon, with offices in New**  
16 **York City and London.**

17 CD Baby was founded in 1998 in Woodstock, New York, by Derek Sivers.

18 Derek Sivers was a musician who created the website to sell his own music.

19 Derek Sivers eventually hired John Steup as his vice president and first employee.

20 Derek Sivers partnered with Oasis Disc Manufacturing to distribute the complete Oasis artist  
21 roster.

22 **In 2001, the firm moved to Portland, Oregon, where they remain headquartered today.**

23 In 2004, CD Baby began offering a digital music distribution.

24 CD Baby became a partner of iTunes.  
25  
26  
27  
28

1 In 2012, CD Baby added YouTube monetization to its services that come included with music  
2 distribution.

3 In 2013, CD Baby Pro Publishing was launched as an add-on that assists independent  
4 songwriters in administering their composition rights and collecting global publishing royalties.  
5 CD Baby service is now available to songwriters in more than 70 countries and territories.  
6

7 In March 2019, Disc Makers sold CD Baby (as part of the AVL Digital Group) to Downtown for  
8 \$200 million. AVL's physical product divisions, Disc Makers, BookBaby, and Merchly, were  
9 acquired in a separate transaction by the Disc Makers executive team as part of the newly formed  
10 DIY Media Group.

11 On March 31, 2020, CD Baby ceased its retail sales of music, in any format, but continued to  
12 manage wholesale music distribution for its musician clients.  
13

14 For its clients, CD Baby offers digital music distribution, worldwide publishing rights  
15 administration, monetization of music use on social video platforms, sync licensing, music  
16 marketing and online advertising, cover song licensing, and physical distribution and order  
17 fulfillment for CDs and vinyl records.  
18

19 By opting into their online distribution service, artists can authorize CD Baby to act on their  
20 behalf to submit music for sale to online retailers such as Spotify, Apple Music, Amazon Music,  
21 Pandora Radio, and 150+ other streaming services.  
22

## 23 XXIX DOWNTOWN MUSIC STUDIO

- 24
- 25 1. Defendant Downtown is a global independent rights management and music services  
26 company. Based in New York City, it is composed of five divisions: AVL Digital Group,  
27 Downtown Music Publishing, Songtrust, Downtown Music Studios, and Neighbouring  
28

1 Rights. In addition to its New York headquarters, Downtown has offices in  
2 Nashville, Los Angeles, London, and Amsterdam.

- 3 2. Downtown Music Publishing owns and/or administers works by songwriter-artists  
4 including The Beatles, Hans Zimmer, Bruce Springsteen, Mötley Crüe, and One  
5 Direction and represents publishing catalogs such as Cy Coleman's Notable Music Co.  
6 Inc. (US), Edizioni Curci (Italy), Kassner Music (UK) and Budde Music (Germany).  
7 Through Songtrust, it provides global royalty collection from more than 90 countries and  
8 20,000 unique income sources worldwide. It also operates Downtown Music Studios, a  
9 recording facility in SoHo, New York.  
10  
11 3. Downtown was founded as Downtown Music Publishing in 2007 by Justin Kalifowitz in  
12 New York. The business model was developed to address the consolidation of the music  
13 publishing industry as well as the new technologies which impacted songwriters and  
14 copyright holders.  
15  
16 4. Downtown Music Studios opened in 2008.  
17  
18 5. In 2011, Downtown formally launched Songtrust as a business unit, extending the  
19 company's royalty collection platform capabilities beyond the parent publishing  
20 company. Neighboring Rights was established in 2016.  
21  
22 6. Until January 2013, Downtown was the owner of the record label Downtown Records.  
23  
24 7. In 2013, Downtown expanded its offices to Los Angeles. In early 2014, the company  
25 expanded to Nashville and later that year founded Downtown Music Benelux. Based in  
26 Amsterdam, Downtown Music Benelux was established in collaboration with Hot Streak  
27 Music, a division of Cloud 9 Music.  
28



- 1 8. In 2015, following the acquisition of the London-based music publisher Eagle-i Music,  
2 Downtown UK was founded.
- 3 9. **In March 2019, Downtown acquired AVL Digital Group for \$200 million. AVL is**  
4 **the owner of CD Baby, Soundrop, AdRev, and DashGo.**  
5
- 6 10. Downtown Music Publishing is the publishing division, ranked in Billboard's Music  
7 Publishing Top 10, is Downtown's primary focus. In addition to administering  
8 copyrights, Downtown Music Publishing's services include royalty collection, songwriter  
9 development, catalog marketing, neighboring rights, and financing services. It arranges  
10 co-writing opportunities and places its songwriter's compositions in film, television,  
11 advertising, and video game productions. Downtown writers have written hit songs for  
12 artists including Beyoncé, Bruno Mars, Carrie Underwood, Katy Perry, Keith Urban,  
13 Rihanna, and Selena Gomez, and, among others, their compositions have been used in the  
14 Hunger Games series, Girls, and Grand Theft Auto. Brands that have featured spots from  
15 Downtown writers include the NFL, Coca-Cola, Apple Inc, Budweiser, and Amazon.  
16
- 17 11. Downtown has formed partnerships with digital service providers including YouTube,  
18 Pandora Radio and LyricFind to directly process data and payments owed to songwriters  
19 and publishers. It provides analysis for songwriters, managers, and lawyers, allowing  
20 writers to review and export statements, see their account balance, create reports for  
21 different periods by income over different territories, and access details of each royalty  
22 line.  
23
- 24 12. In 2016, Downtown Music Publishing was nominated for Music Business Worldwide's  
25 Publisher of the Year Award. The company appeared on the Billboard 2014 list of the  
26 Top 10 Publishers.  
27  
28

- 1 13. Downtown acquired Salli Isaak Music and Salli Isaak Songs in 2018, giving the publisher  
2 the rights to works by One Direction, Madonna, and Sam Smith.
- 3 14. In May 2019, Downtown acquired the 1987 to 2017 catalogue of Belgian music publisher  
4 Strictly Confidential.
- 5 15. In May 2020, Downtown acquired two publishers: Good Soldier Songs (home of The  
6 1975), and the South African Sheer Music.
- 7 16. Songtrust is a global music rights management software platform. Launched in 2011, it  
8 services Downtown's catalog and provides royalty collection services for global  
9 distributors such as CD Baby and The Orchard. The platform enables creators at all levels  
10 to recover their royalties directly from over 90 countries and from more than 20,000  
11 unique income sources worldwide.
- 12 17. Downtown Music Studios is a two studio recording facility located in SoHo, Manhattan.  
13 Opened in 2008, the studios were designed by Martin Pilchner and are overseen by chief  
14 engineer Zach Hancock.
- 15 18. Through its direct affiliations with sound recording performance rights services,  
16 Downtown formally launched a Neighbouring Rights offering globally in 2016. The  
17 division enables Downtown to make certain that artists are compensated when the  
18 recorded performance of their songs are performed in public on satellite and online radio  
19 services such as Pandora.
- 20 19. Audio Video Labs is a Global leader of independent music monetization and distribution  
21 including CD Baby and Soundrop, two leading DIY music distribution services. Also  
22 including promotional tools like HearNow, AdRev, Show.co, and more.
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1 XXX DEFENDANT YOU TUBE

2 YouTube is an American online video-sharing platform headquartered in San Bruno, California.

3 Three former PayPal employees—Chad Hurley, Steve Chen, and Jawed Karim—created the  
4 service in February 2005. Google bought the site in November 2006 for US \$1.65 billion;  
5 YouTube now operates as one of Google's subsidiaries.  
6

7 YouTube allows users to upload, view, rate, share, add to playlists, report, comment on videos,  
8 and subscribe to other users. It offers a wide variety of user-generated and corporate media  
9 videos. Available content includes video clips, TV show clips, music videos, short and  
10 documentary films, audio recordings, movie trailers, live streams, and other content such as  
11 video blogging, short original videos, and educational videos.  
12

13 Most of the content on YouTube is uploaded by individuals, but media corporations including  
14 CBS, the BBC, Vevo, and Hulu offer some of their material via YouTube as part of the YouTube  
15 partnership program. Unregistered users can watch, but not upload, videos on the site, while  
16 registered users are permitted to upload an unlimited number of videos and add comments to  
17 videos. Age-restricted videos are available only to registered users affirming themselves to be at  
18 least 18 years old.  
19

20 YouTube and selected creators earn advertising revenue from Google AdSense, a program that  
21 targets ads according to site content and audience. The vast majority of its videos are free to  
22 view, but there are exceptions, including subscription-based premium channels, film rentals, as  
23 well as YouTube Music and YouTube Premium, subscription services respectively offering  
24 premium and ad-free music streaming, and ad-free access to all content, including exclusive  
25 content commissioned from notable personalities.  
26  
27  
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1 As of February 2017, there were more than 400 hours of content uploaded to YouTube each  
2 minute, and one billion hours of content being watched on YouTube every day.

3 As of October 2020, YouTube is the second-most popular website in the world, behind Google,  
4 according to Alexa Internet. As of May 2019, more than 500 hours of video content are uploaded  
5 to YouTube every minute. Based on reported quarterly advertising revenue, YouTube is  
6 estimated to have US\$15 billion in annual revenues.

7 YouTube has faced criticism over aspects of its operations, including its handling of copyrighted  
8 content contained within uploaded videos, its recommendation algorithms perpetuating videos  
9 that promote conspiracy theories and falsehoods, hosting videos ostensibly targeting children but  
10 containing violent or sexually suggestive content involving popular characters, videos of minors  
11 attracting pedophilic activities in their comment sections and fluctuating policies on the types of  
12 content that is eligible to be monetized with advertising.

13 The YouTube logo was used from its launch until 2011. Another version of this logo without  
14 their "Broadcast Yourself" slogan was used until 2015.

15 YouTube's early headquarters were situated above a pizzeria and Japanese restaurant in San  
16 Mateo, California. The domain name [www.youtube.com](http://www.youtube.com) was activated on February 14, 2005,  
17 and the website was developed over the subsequent months.

18 On October 9, 2006, Google announced that it had acquired YouTube for \$1.65 billion in Google  
19 stock. The deal was finalized on November 13, 2006. Google's acquisition launched new  
20 newfound interest in video-sharing sites; IAC, which now owned Vimeo after acquiring  
21 CollegeHumor, used its asset to develop a competing site to YouTube, focusing on supporting  
22 the content creator to distinguish itself from YouTube.

1 In October 2010, Hurley announced that he would be stepping down as chief executive officer of  
2 YouTube to take an advisory role, and that Salar Kamangar would take over as head of the  
3 company.

4 In February 2014, Susan Wojcicki was appointed CEO of YouTube. In November 2014,  
5 YouTube announced a subscription service known as "Music Key," which bundled ad-free  
6 streaming of music content on YouTube with the existing Google Play Music service.

7  
8 In January 2016, YouTube expanded its headquarters in San Bruno by purchasing an office park  
9 for \$215 million. The complex has 51,468 square meters (554,000 square feet) of space and can  
10 house up to 2,800 employees.

11 On August 29, 2017, YouTube officially launched the "polymer" redesign of its user interfaces  
12 based on Material Design language as its default, as well a redesigned logo that is built around  
13 the service's play button emblem.

14  
15 **On April 3, 2018, a shooting took place at YouTube's headquarters in San Bruno,**  
16 **California.**

17  
18 **On May 17, 2018, YouTube announced the re-branding of YouTube Red as YouTube**  
19 **Premium (accompanied by a major expansion of the service into Canada and 13 European**  
20 **markets), as well as the upcoming launch of a separate YouTube Music subscription.**

21  
22 Countries with YouTube localization

23 The YouTube interface suggests which local version should be chosen based on the IP address of  
24 the user. In some cases, the message "This video is not available in your country" may appear  
25 because of copyright restrictions or inappropriate content. The interface of the YouTube website  
26 is available in 76 language versions, including Amharic, Albanian, Armenian, Burmese, Khmer,  
27  
28

1 Kyrgyz, Laotian, Mongolian, Persian and Uzbek, which do not have local channel versions.  
2 Access to YouTube was blocked in Turkey between 2008 and 2010, following controversy over  
3 the posting of videos deemed insulting to Mustafa Kemal Atatürk and some material offensive to  
4 Muslims. In October 2012, a local version of YouTube was launched in Turkey, with the domain  
5 youtube.com.tr. The local version is subject to the content regulations found in Turkish law. In  
6 March 2009, a dispute between YouTube and the British royalty collection agency PRS for  
7 Music led to premium music videos being blocked for YouTube users in the United Kingdom.  
8 The removal of videos posted by the major record companies occurred after failure to reach an  
9 agreement on a licensing deal. The dispute was resolved in September 2009. In April 2009, a  
10 similar dispute led to the removal of premium music videos for users in Germany.  
11  
12 Leading YouTube content creators met at the White House with U.S. President Obama to discuss  
13 how government could better connect with the "YouTube generation." [306][307].  
14  
15 Conversely, YouTube has also allowed government to more easily engage with citizens, the  
16 White House's official YouTube channel being the seventh top news organization producer on  
17 YouTube in 2012 and in 2013 a healthcare exchange commissioned Obama impersonator Iman  
18 Crosson's YouTube music video spoof to encourage young Americans to enroll in the Affordable  
19 Care Act (Obamacare)-compliant health insurance. In February 2014, U.S. President Obama held  
20 a meeting at the White House with leading YouTube content creators to not only promote  
21 awareness of Obamacare but more generally to develop ways for government to better connect  
22 with the "YouTube Generation."  
23  
24 Google first published exact revenue numbers for YouTube in February 2020 as part of  
25 Alphabet's 2019 financial report. According to Google, YouTube had made US\$15.1 billion in  
26 ad revenue in 2019, in contrast to US\$8.1 billion in 2017 and US\$11.1 billion in 2018.  
27  
28

1 YouTube's revenues made up nearly 10% of the total Alphabet revenue in 2019. These revenues  
2 accounted for approximately 20 million subscribers combined between YouTube Premium and  
3 YouTube Music subscriptions, and 2 million subscribers to YouTube TV.

4  
5  
6 XXXI DEFENDANT SPOTIFY

7 Spotify is a Swedish audio streaming and media services provider, launched in October 2008.  
8 The platform is owned by Spotify AB, a publicly traded company on the New York Stock  
9 Exchange since 2018 through its holding company Spotify Technology S.A. based in  
10 Luxembourg. Spotify's global headquarters are in Stockholm, Sweden.

11 Spotify offers digital copyright restricted recorded music and podcasts, including more than 60  
12 million songs, from record labels and media companies. As a freemium service, basic features  
13 are free with advertisements and limited control, while additional features, such as offline  
14 listening and commercial-free listening, are offered via paid subscriptions. Users can search for  
15 music based on artist, album, or genre, and can create, edit, and share playlists.

16 Spotify is available in most of Europe and the Americas, Oceania, and parts of Africa and Asia,  
17 and on most modern devices, including Windows, macOS, and Linux computers, and iOS, and  
18 Android smartphones and tablets and AI enabled smart speakers such as Amazon Alexa. As of  
19 October 2020, the platform has 320 million monthly active users, including 144 million paying  
20 subscribers.

21 Unlike physical or download sales, which pay artists a fixed price per song or album sold,  
22 Spotify pays royalties based on the number of artist streams as a proportion of total songs  
23 streamed. It distributes approximately 70% of its total revenue to rights holders (often record  
24 labels), who then pay artists based on individual agreements. Spotify has faced criticism from  
25  
26  
27  
28



1 artists and producers including Taylor Swift and Thom Yorke, who have argued that it does not  
2 compensate musicians fairly. In 2017, as part of its efforts to renegotiate license deals for an  
3 interest in going public, Spotify announced that artists would be able to make albums  
4 temporarily exclusive to paid subscribers if the albums are part of Universal Music Group or the  
5 Merlin Network.

6  
7 In February 2017, Spotify announced a major expansion of its United States operations in Lower  
8 Manhattan, New York City, at 4 World Trade Center, adding approximately 1,000 new jobs and  
9 retaining 832 existing positions. **The company's US headquarters are located in New York**

10 **City's Flatiron District.**

11 On 14 November 2018, the company announced a total of 13 new markets in the MENA region,  
12 including the creation of a new Arabic hub and several playlists, while supporting right-to-left  
13 text in their apps.

14  
15 In April 2020, Spotify reached 133 million premium users.

16 On 12 April 2018, Spotify acquired the music licensing platform Loudr. On 6 February 2019,  
17 Spotify acquired the podcast networks Gimlet Media and Anchor FM Inc., with the goal of  
18 establishing themselves as a leading figure in podcasting. On 26 March, Spotify announced they  
19 would acquire another podcast network, Parcast. On 12 September, Spotify acquired  
20 SoundBetter, a music production marketplace for people in the music industry to collaborate on  
21 projects, and distribute music tracks for licensing.

22  
23 On 5 February 2020, Spotify announced its intent to acquire Bill Simmons' sports and pop  
24 culture blog and podcast network The Ringer for an undisclosed amount. In November, Spotify  
25 announced plans to acquire Megaphone from The Slate Group for US\$235 million.

## XXXII DEFENDANT DISTROKID

DistroKid is an independent digital music distribution service, founded in 2013 by American entrepreneur Philip J. "Pud" Kaplan. DistroKid principally offers musicians and other rights-holders the opportunity to distribute and sell or stream their music through online retailers such as iTunes, Spotify, Pandora, Amazon Music, Google Play Music, Tidal, Deezer, iHeartRadio and others.

In July 2015, a DistroKid release by musical act Jack & Jack went to #1 worldwide in the iTunes charts. This was particularly notable because DistroKid does not take a commission of royalties, making this the first time a #1 charting artist was able to keep 100% of their earnings.

In May 2016, DistroKid launched a feature called "Teams" that makes it possible for royalties to be automatically sent to collaborators and shareholders. Since then Distrokid has made several other developments including partnering with Spotify to support cross-platform uploads for Spotify artists who upload directly or have direct licensing deals with the company and an investment from Silversmith Capital Partners.

## PRESCRIPTION DECISIONS THAT ARE IMPORTANT IN THIS CASE:

## 1. PK Music v. Justin Timberlake, et al. 1:16-cv-01215 (S.D.N.Y. 2016)

On July 18, 2016, Defendants moved to dismiss copyright infringement claims involving Justin Timberlake's hit "Damn girl", which allegedly contained an unauthorized sample from Plaintiff's "New Day". The motion to dismiss contends that in *Petrella v. MGM, Inc.*, the Supreme Court established that retrospective relief is limited to infringement

1 occurring within three years before the time of suit. The Plaintiffs should, therefore, be  
2 unable to seek relief for alleged infringements occurring prior to February 17, 2013.

3 In the most recent development in this dispute, however, US District Judge Vernon  
4 Broderick ruled that because the Second Circuit follows the discovery rule for  
5 determining the applicability of the statute of limitation, Patrella was not applicable to  
6 this case. Under the discovery rule, the limitation period starts only when the plaintiff  
7 discovers or should have discovered, the alleged infringement. According to the  
8 Plaintiff's, they had 'never heard Damn Girl before August 2015, never purchased or  
9 possessed a copy of the Album or DVD, and never attended a Timberlake concert or saw  
10 one on television or DVD.' Thus, claims for infringements that occurred more than three  
11 years before the suit was filed could still be timely, since the infringement was  
12 discovered at later date. Moreover, Patrella did not overrule the discovery rule, and even  
13 took notice of its applicability among nine circuits, prompting Judge Broderick to assert  
14 that: "I am bound by the precedent in this circuit to apply the discovery rule and not to  
15 apply the three-year lookback."  
16

17  
18  
19 This procedural ruling only holds that the suit was filed in a timely manner and cannot be  
20 dismissed under Federal Rule of Civil Procedure 12(b) (6).

21 2. United States Court of Appeals, Second Circuit.

22 Louis PSIHOYOS, Plaintiff–Appellee–Cross–Appellant, v. JOHN WILEY & SONS,  
23 INC., Defendant–Appellant–Cross–Appellee.

24 Docket Nos. 12–4874–cv(L), 12–5069–cv(XAP).

25 Decided: April 04, 2014  
26  
27  
28

1 Civil actions for copyright infringement must be “commenced within three years after the  
2 claim accrued.” 17 U.S.C. § 507(b). The District Court held that an infringement claim  
3 does not “accrue” until the copyright holder discovers, or with due diligence should have  
4 discovered, the infringement (the so-called “discovery rule”). There is no dispute that  
5 under the discovery rule none of Psihoyos's claims are time-barred.  
6

7 This Circuit has previously employed a discovery rule for copyright claims under 17  
8 U.S.C. § 507(b). See *Merchant v. Levy*, 92 F.3d 51, 56 (2d Cir.1996); *Stone v. Williams*,  
9 970 F.2d 1043, 1048 (2d Cir.1992). Wiley strives to distinguish the cases in which we  
10 have done so on the ground that they involved co-ownership claims. We reject Wiley's  
11 suggestion that we apply different accrual rules for ownership and infringement claims,  
12 both of which are governed by 17 U.S.C. § 507(b). In doing so, we join every Circuit to  
13 have considered the issue of claim accrual in the context of infringement claims.  
14

15 We agree with our sister Circuits that the text and structure of the Copyright Act, unlike  
16 the FCRA, evince Congress's intent to employ the discovery rule, not the injury rule.  
17 Policy considerations also counsel in favor of the discovery rule in this context. See  
18 *William A. Graham Co. v. Haughey*, 568 F.3d 425, 434–37 (3d Cir.2009) (“[U]se of the  
19 discovery rule comports with the text, structure, legislative history and underlying  
20 policies of the Copyright Act”). For substantially the reasons articulated by other Circuits  
21 that have grappled with this issue after *TRW* was decided, see *supra* note, we conclude  
22 that copyright infringement claims do not accrue until actual or constructive discovery of  
23 the relevant infringement and that the Act's statute of limitations did not bar any of  
24 Psihoyos's infringement claims.  
25  
26  
27  
28

1        3.        The matter, *Sohm v. Scholastic Inc.*, 2020 WL 2375056 (2d Cir. May 12, 2020),  
2        concerned photographer Joseph Sohms claim that book publisher Scholastic Inc. had  
3        used his photos in more print runs than contemplated by the invoices governing its  
4        licenses.

5        *Discovery Rule Tolls the Copyright Statute of Limitations, Even After Petrella.*

6        The court rejected Scholastic's argument that the Supreme Court in *Petrella v. Metro-*  
7        *Goldwyn-Mayer, Inc.*, 572 U.S. 663 (2014) held that the statute of limitations on a  
8        copyright claim begins to run when the "injury," i.e., the infringement occurs, abrogating  
9        the traditional discovery rule in nine circuit courts. To the contrary, the court reasoned,  
10       the Supreme Court expressly declined to decide that question.

11       Accordingly, the 2nd Circuit will continue to use the discovery rule, under which an  
12       infringement claim does not accrue until the copyright holder discovers or should have  
13       discovered the infringement.

14       In *Sohm*, the court ruled that this required Scholastic to identify "some affirmative  
15       evidence that would have been sufficient to awaken inquiry and prompt an audit" by the  
16       photographer, rejecting Scholastic's claim that "the passage of time alone," without any  
17       effort by Sohms to conduct an audit or make an inquiry, was sufficient.

18       **FACTS:**

- 19       1. The plaintiff Joey 6'1 is an independent music composer and singer. He was born and  
20       still lives in Arecibo, Puerto Rico.
- 21       2. Plaintiff Joey 6'1 with only 20 years of age decided, worked and made sacrifices to create  
22       his greatest project, which consisted of a major CD that included several of his solo songs

1 and a great number of songs with the main American and Puerto Rican Hip Hop artists  
2 featuring on them.

- 3 3. This musical album is titled "Sueños y Leyendas" (Dreams and Legends), since it was his  
4 dream come true and included all the singers that he believed were the legends ever since  
5 he was a child. The Plaintiff Joey 6'1 in the music album had the opportunity to get to  
6 personally meet and sing alongside with those he considered his "idols", within the music  
7 industry.  
8
- 9 4. The Plaintiff father, Jose Ramon Cordero-Rodriguez, is a lawyer and businessman, who  
10 back then had available economical resources, told him he had faith in his talent and that  
11 he would finance his project, as long as there was a commitment on repaying the full  
12 amount, at no interest.  
13
- 14 5. And thus, his project became a reality, with an overall cost of four hundred thousand  
15 dollars (\$400,000.00). almost all the money went towards paying the artists that featured  
16 with him. This also included the payment for music tracks, recording studios, models,  
17 graphic designers, photographers, round trip airplane tickets to Detroit, Michigan, as well  
18 as New York, from San Juan, Puerto Rico, hotels, meals, land transportation, among  
19 other expenses.  
20
- 21 6. This project did not only cost this great amount of money, but it also almost cost his life.  
22 There was a misunderstanding between Obie Trice and José Ramón Cordero Ladner  
23 while filming a video, which ended up in the intervention of two Obie Trice's  
24 bodyguards, who beat him throughout all his body, with no mercy. The Defendant Obie  
25 Trice hit him on the head, with pistol whips, causing a severe cerebral contusion. When  
26 they were about to shoot him, the present models guarded him with their bodies and their  
27  
28

1 screams caused great alarm at the hotel in which the video was being recorded, which  
2 caused Obie Trice and his bodyguards to leave the place without killing him.

3 7. The police arrived and he was taken on an ambulance to a hospital, from which after  
4 stabilizing him, immediately the police escorted him to the airport of Detroit, because the  
5 police could not assure his safety and his life. We must remember the dangers that prevail  
6 in Detroit. Even greater within the area, known as 7 Mile street. All those risks, dangers,  
7 and facing death, all for trying to make his dream come true: the CD album "Sueños y  
8 Leyendas" ("Dreams and Legends").  
9

10 8. From there, he moved to record at the studio with Slaughterhouse, within the most  
11 dangerous area at Manhattan, New York. All that effort to produce the CD album  
12 "Sueños y Leyendas".  
13

14 9. Certainly, he could have produced a lot of money from sales and royalties, publishing  
15 advertisements on YouTube, and it could have been the first step for Joey 6' 1" in a  
16 career within the music industry, that would have launched him to the top.  
17

18 10. But all of that was finished, killed, and buried by the Defendants intentional, abusive,  
19 and malicious actions.

20 11. Ahead the "Ledgers" that show the expenses related to the musical production titled  
21 "Sueños y Leyendas" (Dreams and Legends).  
22

23 12. The Defendants culpable, intentional, and malicious acts towards the plaintiff destroyed  
24 his career and his future.

25 13. In order to raise his artistical career, José Ramón Cordero-Ladner made a great and  
26 extensive paid promotional campaign during the months of October, November and  
27 December 2019, on Joey 6' 1" Facebook's webpage. This campaign was made to  
28



1 promote, one by one, the 45 tracks included in “Sueños y Leyendas” (Dreams and  
2 Legends) CD album, “La Reválida” (The Bar Exam) CD album, the CD album  
3 “Halloween 2”, the single “Without a Oven Mitt”, featuring with the rapper Joe Budden,  
4 the single “Ella No Quiere Pitorro, Quiere Chichaíto” (She Doesn’t Want Pitorro, She  
5 Wants Chichaíto).

6  
7 14. This was a successful campaign, and each of the promoted songs had thousands of  
8 playbacks. Undoubtedly, this proves the general public likes Joey 6’ 1”, as well as his  
9 musical productions.

10 15. The paid promotional campaign on Joey 6’ 1” Facebook webpage was huge during the  
11 months of October, November, and December of 2019. The public acceptance towards  
12 Joey 6’ 1”, and his music publications is shown by the thousands of playbacks they  
13 reached. It also shows that the promotional campaign’s magnitude was huge.

14 16. This great promotional campaign on Facebook that took place during the months of  
15 October, November, and December of 2019 had an estimate cost of \$10,000 (ten  
16 thousand dollars) for José Ramón Cordero Ladner.

17  
18 17. The Plaintiff Joey 6’1 found out about all the events due to the content of the email, he  
19 received from CD Baby titled “CD Baby/AVL Legal & Business Affairs”, on January 7,  
20 2020. Before that email, the Plaintiff José Ramón Cordero-Ladner (Joey 6’1) was  
21 unaware of the events that were happening, which would be detailed further on, within  
22 this Complaint.

23  
24 18. The CD Baby email to Plaintiff Jose Ramon Cordero-Ladner, dated on January 7, 2020  
25 clearly stated:

26  
27 “Dear Jose,  
28

1 I just received an email from Spotify regarding an internally raised claim regarding your  
2 content. Below is the email I received from Spotify, listing the titled in dispute, "Sueños  
3 y Leyendas".

4 The below content has been flagged internally. Please check, including with the  
5 artist/label where appropriate, to ensure CD Baby has all necessary rights to deliver the  
6 products below. While this claim is under investigation, this content will be removed  
7 from the service...."

9 19. It is not known exactly, but it is believed that the copyright infringement and all other  
10 illegal acts started occurring in a continuous and uninterrupted way since the year 2013.

11 20. These actions from some of the defendants persist in a continuous way since October 18,  
12 2013, when "Pimp Stroll", their plagiarized song, and their CD album, named "Game  
13 Over" which contains the song called "Pimp Show" was published. From that date, they  
14 continued, and will continue, until a court puts a halt to them. Even though the exact date  
15 in which it all began is unknown.  
16

17 21. It cannot take place in any court, in the state of Michigan, least of all, Detroit since it  
18 would put Joey 6' 1", and the lives of all of those who are to accompany him in danger,  
19 due to the serious incidents that happened with Defendant Obie Trice and his bodyguards,  
20 which almost caused the death of Joey 6' 1". The risk of death for Joey 6' 1", all of those  
21 who were to accompany him, as well as his legal representants increases with the filling  
22 of these lawsuits and claims.  
23

24 22. The CD album titled "Game Over" was recorded, distributed, and sold by: D12, Top  
25 Prospect, Global Top Prospect and other defendants.  
26  
27  
28

1 23. In addition, songs belonging exclusively to the plaintiff were also used in promotions, as  
2 other CD albums' intros, shows, performances, featuring with other artists, and so on. All  
3 of this in violation of the plaintiff's copyrights.

4 24. Suspended from receiving payment due to digital stores not selling his songs. Suspended  
5 from receiving payment from royalties of his songs, since they were illegally  
6 appropriated, and sold as singles, or as part of a CD album, named "Game Over".  
7

8 25. The CD album "Game Over" that was recorded, released, distributed, and sold by D12  
9 Global Top Prospect, Top Prospect, and other defendants. Songs that are absolute  
10 property of the plaintiff were used in promotions, as other CD albums' intros, shows,  
11 performances, featuring with other artists, and so on. All of this in violation of the  
12 plaintiff's copyrights.  
13

14 26. Suspended from receiving income by preventing his song from monetizing on YouTube,  
15 Spotify and other social media platforms.

16 27. Suspended from receiving income by preventing Joey 6' 1" 's development as a singer.

17 28. Since January 23, 2020, José Ramón Cordero Ladner has not been able to return to his  
18 regular job, as Legal Officer. He is suffering concentration and memory problems. He is  
19 undergoing treatment with a private psychiatrist, who is Dr. Juan Fumero.  
20

21 29. The song "Pimp Show, which copyright belongs total and absolutely to the Plaintiff;  
22 which is also included in the musical production (CD album) "Sueños y Leyendas  
23 (Dreams and Legends), recorded by Joey 6' 1", on May 2010, and uploaded through CD  
24 Baby, "for its distribution and sale" on May 5, 2010, and uploaded by CD Baby to  
25 YouTube, in 2015.  
26  
27  
28

1 30. According with the original intention, the song was included on the “Sueños y Leyendas”  
2 (Dreams and Legends) CD album, and it clearly stands from the CD album’s cover  
3 (created by Mr. Outlet, at a cost of \$500.00).

4 31. The previous picture (CD Baby’s report recently sent to José Ramón Cordero Ladner)  
5 undoubtedly and undeniably proves that CD Baby had “Sueños y Leyendas” (Dreams and  
6 Legends) CD album available for sale since the year 2009, and even that they sold the  
7 first CD’s copy on December 12, 2009. From the evidence emerges that CD Baby sold  
8 other 5 copies from this CD album during the following dates:

- 9  
10 • January 4, 9, 17, 2010  
11 • February 8, 2010  
12 • August 4, 2010  
13

14 Oddly, the “Sales & Report” statement produced by CD Baby shows that the CD album “Sueños  
15 y Leyendas” did not have a single sale since August 5, 2010 up to present day (January 24,  
16 2020). In other words, during the following 10 years not a single copy of the CD album “Sueños  
17 y Leyendas” was sold. This is incredible, and impossible. It is particularly odd that this happens  
18 to a CD album that contains more than 45 songs with the main American Hip Hop artists, as well  
19 as the main Puerto Rican rappers.  
20

21 On another report from CD baby, sent to José Ramón Cordero Ladner to inform him that during  
22 eleven years in which CD Baby has been able to distribute and sell the CD album “Sueños y  
23 Leyendas”, it has generated through digital sales a total income amount of \$627.39. this is truly  
24 ridiculous. There are only two possible scenarios:

- 25  
26 • CD Baby illicitly appropriated the income generated from the CD album’s digital sales  
27  
28

1 • In a culpable or reckless manner, paid that money to third parties, such as all the artists  
2 who featured with Joey 6' 1" on said CD album, among all the defendants that plagiarized the  
3 song "Pimp Show".

4 Oddly, among the two documents previously discussed, CD Baby sends José Ramón Cordero  
5 Ladner a notice that states they are proceeding a \$50.00 payment of the digital sales of the  
6 musical productions that CD Baby is in charge. That payment has not been claimed yet,  
7 obviously.

8 CD Baby also sent José Ramón Cordero Ladner a chart which includes all the musical  
9 productions it has for sales and distribution.

10 Also, CD Baby sent Joey 6' 1" a chart related to the flagged/strike Spotify gave him.

11 All these notices were sent on Tuesday January 21, 2020, with the emails that we have in  
12 evidence. CD Baby had never sent José Ramón Cordero Ladner a single notice (Joey 6' 1") in  
13 exactly, eleven years.

14 The song "Pimp Stroll, which is the full and exact plagiarized material, including the recording,  
15 lyric and track made by many of the Plaintiff song "Pimp Show".

16 "Pimp Stroll" is an exact copy of "Pimp Show". This similarity gets exposed when listening to  
17 both songs. However, it is clearly determined by two of the biggest music distributors in the  
18 world: Cd Baby and Spotify.

19 Email messages sent regarding this matter, from CD Baby to José Ramón Cordero Ladner:

20 José Ramón Cordero Ladner's (Joey 6' 1") final reply to these email messages is shown further.

21 This email messages have abundant evidence that we have within our power.

22 As a reply, CD Baby sent an email message to José Ramón Cordero Ladner, stating he was  
23 correct.

1 The track for the song "Pimp Show", created by the famous DJ Green Lantern is also absolute  
2 property of the Plaintiff, to which all the copyright pf this track belongs.

3 "Joey 6' 1" selected and contracted with " DJ Green Lantern", who also made tracks for  
4 Eminem, for him to make the track for the song. The contract/agreement was given, and "Green  
5 Lantern" made it, at a \$6,000 price per track.  
6

7 It is clear that "DJ Green Lantern" relinquished his rights over each track to the Plaintiff.  
8 Therefore, neither "DJ Green Lantern" or any other natural or juridical person can use it without  
9 the Plaintiff' authorization, and the corresponding payment to the Plaintiff.

10 "Green Lantern" relinquished all his rights over the track, and over the income produced by the  
11 track, in exchange of a \$6,000 amount, paid by the plaintiff.  
12

13 The Defendants agreed with Plaintiff Joey 6'1, and contracts/agreements were granted for a Joey  
14 6' 1" featuring with D12, as well as another featuring for a solo song with Swift McVay,  
15 member of the band. They agreed that for every featuring, the plaintiff would pay \$6,000, for a  
16 total of \$12,000.  
17

18 From all the agreements the Defendants relinquished all their rights, in regarding to this song, the  
19 track, as well as the right to receive all the income the song could generate.

20 The plaintiff made an \$6,000 extra payment to reach and contact for Obie Trice, for the amount  
21 of \$18,000, which they did. The plaintiff paid an additional \$3,000 to Obie Trice, for featuring in  
22 a song with Joey 6' 1".  
23

24 As shown, this collaboration reached a total amount of \$21,000 just in payment to the mentioned  
25 artists.

26 On May 2009, Joey 6' 1" was only 20 years of age and using the track he bought from "Green  
27 Lantern", he sang a featuring on the song "Pimp Show" with the musical group D12. Also,  
28

1 around that time, Joey 6' 1" sang on a featuring with Swing McVay, member of D12, another  
2 song titled "Whoa!" Joey 6' 1" 's song, featuring Obie Trice was sung and later recorded during  
3 August 2009.

4 It is clear how Ricore Shelton, manager of D12, Green Lantern and Obie Trice was excessively  
5 profiting from Joey 6' 1" 's interest of recording with his idols, D12, as well as other artists  
6 related to D12.

7  
8 Regarding the intention, such songs were included in the "Sueños y Leyendas" CD album, as  
9 clearly shown on the cover of "Sueños y Leyendas", made by "Daulet Art". At a cost of \$500.00.

10 1. Swifty McVay

11 Swifty McVay, whose real name is Ondre Moore, is mainly responsible regarding the plaintiff,  
12 for being a member of the band D12, as well as on personal matter. Swift was and is aware that  
13 both "Pimp Show" and "Whoa!" copyrights are full property of the plaintiff. Swift appears in  
14 Pimp Show's music video, with an outstanding and main participation. He also sang along with  
15 "Joey 6' 1". Swift participated actively, along with "Joey 6' 1" while filming the song's video  
16 clip, he was part of the video clip, and he made expressions within the musical video clip.  
17

18 2. Bizarre

19 His legal name is Rufus Arthur Johnson, also known as "Rufus Johnson" and "Peter S. Bizarre".  
20 Mainly responsible in regarding to the plaintiff, for being a member of the band D12, as well as  
21 on personal matter. Bizarre was and is aware that "Pimp Show" copyrights are full property of  
22 the plaintiff. Bizarre appears in Pimp Show's music video, with an outstanding and main  
23 participation. He also sang along with "Joey 6' 1". Bizarre participated actively, along with  
24 "Joey 6' 1" while filming the song's video clip, he was part of the video clip, and he made  
25 expressions within the musical video clip.  
26  
27  
28



1 3. Kuniva

2 Kuniva is mainly responsible in regarding to the plaintiff, for being a member of the band D12,  
3 as well as on personal matter. Kuniva was and is aware that "Pimp Show" copyrights are full  
4 property of the plaintiff. Kuniva appears in Pimp Show's music video, with an outstanding and  
5 main participation. He also sang along with "Joey 6' 1". Bizarre participated actively, along with  
6 "Joey 6' 1" while filming the song's video clip, he was part of the video clip, and he made  
7 expressions within the musical video clip.  
8

9 The fact that José Ramón Cordero Ladner (Joey 6' 1") was naïve and fully unaware of the  
10 atrocity that was being done to him; the approach made by the new manager to the plaintiff, in  
11 order to record a new featuring, specifically with Kuniva's participation.  
12

13 4. DJ Green Lantern

14 "Joey 6' 1" selected and hired "DJ Green Lantern", who also made tracks for Eminem, his idol)  
15 for him to make the track for the song. The contract/agreement was given, and "Green Lantern"  
16 made it, at a \$6,000 price per track.  
17

18 During May 2009, with Joey 6' 1" only being 20 years of age and using the track he bought from  
19 "DJ Green Lantern". He sang the song titled "Pimp Show", featuring the music band D12 and  
20 other Defendants.

21 "DJ Green Lantern" is mainly responsible in regard to the plaintiff. "Green Lantern" was and is  
22 aware that "Pimp Show" copyrights are full property of the plaintiff.  
23

24 Regardless, "Green Lantern" sold the plaintiff same track once again, or somehow provided it to  
25 the authors of "Pimp Stroll – who are also defendants - so that they could use it.  
26  
27  
28

1 It is clearly shown that “DJ Green Lantern” relinquished his copyrights over the referred track to  
2 the plaintiff. Therefore, neither “Green Lantern” or any other natural or juridical person can use  
3 it without the plaintiff’s authorization, and the corresponding payment to the plaintiff.

4 “DJ Green Lantern” relinquished all his rights over the track, and over the income produced by  
5 the track, in exchange of a \$6,000 amount, paid by the plaintiff.  
6

7 Note that Green Lantern was also a member of Shady Records, at that time.

8 This project did not only cost this great amount of money, but it also almost cost his life. Obie  
9 Trice insulted Joey 6’ 1” while filming a video, which ended up with a fistfight among them, and  
10 the intervention of two Obie Trice’s bodyguards, who beat him through all his body, with no  
11 mercy. They hit him on the head, with pistol whips, causing a severe cerebral contusion. When  
12 they were about to shoot to kill him, the present models guarded him with their bodies and their  
13 screams caused great alarm at the hotel in which the video was being recorded, which caused  
14 Obie Trice and his bodyguards to leave the place without killing him. The police arrived and he  
15 was taken on an ambulance to a hospital, from which after stabilizing him, immediately the  
16 police escorted him to the airport to get out of Detroit, because the police could not assure his  
17 safety and his life. We must remember the dangers that prevail in Detroit. Even greater within  
18 the area, known as 7 Mile street. All those risks, dangers, and facing death, all for trying to make  
19 his dream come true: the CD album “Sueños y Leyendas”. The photographs and medical records  
20 regarding this incident are within our power. We tried to report Obie Trice and his two  
21 bodyguards, but our efforts were unsuccessful. On that same day, Joey 6’ 1” moved to New  
22 York, and then moved to Puerto Rico the next day. It is possible that Obie Trice’s hate towards  
23 Joey 6’ 1” would make him actively participate in the culpable acts that conform this lawsuit.  
24  
25

26 We have evidence regarding Obie Trice’s aggression towards Joey 6’ 1”:  
27  
28

- 1 • Detroit Medical Center's Discharge Instruction, dated 1/28/2010.
- 2 • José Ramón Cordero Ladner's (Joey 6' 1") photograph at Detroit Medical Center.
- 3 • Notice sent to Officer Hopkins (3049) with an events detailed timeline, dated February
- 4 11, 2010.
- 5 • Notice sent via email from Detroit's Investigator Jones, which indicates the case is
- 6 undergoing investigation.
- 7

8 5. Obie Trice

9 Obie Trice is part of a group of friends who are rappers from Detroit, Michigan. His manager is  
10 Ricore Shelton, the same as the rest of the defendants. Obie Trice and two of his bodyguards  
11 almost kill Joey 6' 1", during a recording session, at Detroit, Michigan. Obie Trice continued to  
12 threaten Joey 6' 1" 's life. Obie Trice has been and still is very active within the music genre, along  
13 with D12 members, mainly on performances and "featurings" with Swift McVay. It is certainly  
14 possible that he might have participated within the previously described scheme against Joey 6'  
15 1".  
16

17 6. Ricore Shelton

18 Ricore Shelton, manager of D12, Swift McVay, Green Lantern and Obie Trice; also acted in a  
19 culpable and/or reckless manner, on a personal matter.  
20

21 Ricore Sheldon was manager of D12, Swift McVay, Bizarre, Kuniva, Green Lantern, and Obie  
22 Trice at the time he was hired, and incurred in duties under his name, and relinquished plaintiff's  
23 copyright. He continued to perform as the defendants' manager, and wrongful or recklessly he  
24 allowed the violation of contractual obligations these defendants had with the plaintiff.  
25  
26  
27  
28

1 It is important to highlight and acknowledge that during July 2009, Mr. Ricore Sheldon showed  
2 up interest in becoming Joey 6' 1" 's manager/musical producer/agent and he sent Joey 6' 1" a  
3 written proposal in regard to those purposes.

4 We have evidence (not related to the proposal, but to his labor related to the "Sueños y  
5 Leyendas" CD album) regarding some of the payments made to Ricore Shelton, by the Plaintiff.

6 Hereunder the last chat conversations during November 2019 between Ricore Shelton and Joey  
7 6' 1" held on Instagram (mobile application through which they follow each other) that reflect  
8 mutual interest in establishing commercial relationship within the Hip Hop scene.  
9

10 7. State of Muse, Inc.

11 State of Muse Inc. is a Ricore Shelton's corporation that could or could not be responsible of  
12 Ricore Shelton's culpable and/or reckless acts that caused liquidated damages to the plaintiff.  
13

14 8. Shady Records Corporation

15 Shady Records at the time of the events on which this lawsuit stands are or was D12's individual  
16 (Swift McVay, Bizarre, Kuniva, and others who form D12)), Green Lantern, and other  
17 defendants' owner corporation and/or agent. Therefore, is fully responsible of all the culpable  
18 and reckless acts committed, and still ongoing by the defendants.  
19

20 9. Interscope Records Corporation

21 Interscope Corporation is or was at the time the events to which this lawsuit refers to, Shady  
22 Records Corporation Partner. Therefore, it is equally responsible of the culpable and reckless  
23 acts committed, and still ongoing by most of the defendants.  
24

25 10. Universal Group

26 Universal Group is then parent corporation in partnership with Shady Records and Interscope.  
27 Therefore, it is equally responsible of all its actions and omissions.  
28

11. “Top Prospect”, whose legal name is Warren Mitch

“Top Prospect” whose legal name is Warren Mitch an artist that deliberately, maliciously, and with personal and self-knowledge, and malicious intent. of illegal appropriation, plagiarizes Joey 6’ 1” ‘s song titled “Pimp Show” which is included within Joey 6’ 1” ‘s musical production, titled “Sueños y Leyendas” and which all the defendants include it in the CD album “Game Over” and in other musical productions, naming it “Pimp Stroll”.

During that period, as well as during the time they took the full recording of Joey 6’ 1” ‘s song “Pimp Show” and its related video, the defendant Warren Mitch (Top Prospect) was present at the studio in which the song was recorded. Alongside, an individual that took video of everything that happened in the recording studio was accompanying him.

The whole recording of the song, the video and the editing of these occurred on May 2009, at the DJ Kidd Studio.

12. Besides including the plagiarized song “Pimp Stroll” in their CD album “Game Over”. In a clear culpable, malicious act of illegal appropriation, and copyright theft, it was also included as main song in the CD album titled Coast 2 Coast, Mixtape Vol. 244 – Hosted by Too Short.

Notice how expressly and maliciously Global Prospect also includes the song that was plagiarized from Joey 6’ 1”, which they titled “Pimp Stroll GTP Ft. D12”.

Emphasize on how the photographs that proceeds from Global Top Prospect Inc. and the artist Top Prospect, who happens to be GTP’s CEO and cofounder alongside This is Hurley. There are photographs, messages, tattoos, signals which clearly prove some sort of equal identity or special association with D12.

Like the defendants previously mentioned, Global Top Prospect is equally responsible for all the damages caused to the plaintiff.

1 13. Defendant ThisisHurley

2 His legal name is Jay Sweeney

3 Jay Sweeney is Global Top Prospect LLC's cofounder, alongside with Warren Mitch.

4 In a culpable, malicious and deliberate common agreement, the herein defendants plagiarize the  
5 song, the track and the recording of the song "Pimp Show", with the only change of naming it  
6 "Pimp Stroll". On the original song (they did not even make another recording), and using the  
7 same recording session of "Pimp Show" (the original song), they take out the part sung by Joey  
8 6' 1", and replace it with Top Prospect, singing the exact same part. D12's part remains the same  
9 as in "Pimp Show", using the same recording session as the original song without even re-  
10 recording it The song, product of plagiarism is included in a new CD album titled "Game Over"  
11 with the song's title (D12, Top Prospect – Pimp Stroll (Remix) Feat D12) and it is uploaded to  
12 YouTube and other internet App that download music.  
13  
14

15 14. The defendant's false allegation of plagiarism is obvious, since it is clear to see who  
16 plagiarized who, according to the time sequence, since there is no doubt that on May 2009 (date  
17 in which the song was recorded), the plaintiff song "Pimp Show" precedes "Pimp Stroll", which  
18 date goes back to October 18, 2013. The plagiarized song "Pimp Stroll" is available for sale as a  
19 single, and as part of the "Game Over" CD album on all national and international digital  
20 platforms, as well as on YouTube.  
21

22 15. It is clear the song produces income and royalties for the defendants, by selling the song  
23 as a "single", as part of a CD album, and after uploading the video on YouTube, CD Baby,  
24 Spotify and other Defendants. Royalties of which the plaintiff have not received a single  
25 payment. The Plaintiff were not informed about this in any way or by any means.  
26

27 16. The defendants, not conforming with these actions, falsely reported on Spotify that the  
28

1 plaintiff plagiarized the song. Without verifying or investigating if this complaint was true,  
 2 Spotify notifies CD Baby; the plaintiff did not receive any kind of notice from Spotify, which  
 3 proceeded to “flag” or “strike” not only the song “Pimp Show”, but also José Ramón Cordero  
 4 Ladner’s (Joey 6’ 1’) whole CD album, preventing its sales within all the stores and digital  
 5 platforms, and blocking the video that was remove from YouTube. The song “Pimp Show” as  
 6 well as the whole CD album “Sueños Y Leyendas” was kept from generating ant kind of income,  
 7 or monetize in any way possible, like advertisements on YouTube. It is not possible that a CD  
 8 album with the content included in the “Sueños y Leyendas” CD album was unable to produce  
 9 to the plaintiff a single payment.  
 10

11 17. The situation goes even further, since because of the defendants culpable actions, Joey  
 12 6’1” was or has been placed on a “blacklist”, by Spotify and CD Baby, which blocks and  
 13 prevents the preceding and succeeding productions to “Sueños y Leyendas” from selling, without  
 14 excluding productions such as:  
 15

- 16 • “La Reválida; a CD album which includes 20 songs
- 17 • “Halloween 2”; single
- 18 • A single, featuring the greatest Hip Hop artist, Joe Budden
- 19 • “Chichaíto”; single
- 20

21 18. The resemblance between the songs “Pimp Show” and “Pimp Stroll” clearly surfaces  
 22 from an email sent to José Ramón Cordero Ladner by one CD Baby’s lawyers (as shown  
 23 ahead):  
 24

25 To which José Ramón Cordero Ladner replied through an email to CD Baby, as shown ahead:  
 26 Evidence will be presented ahead in regards as to how Joey 6’ 1” ‘s musical productions were  
 27 initially blocked, and further eliminated from YouTube:  
 28



1 19. Proof of how Joey 6' 1" appeared in ASCAP when he subscribed and protected his songs,  
2 during the year 2009.

3 20. John Doe or John Doe Corporation

4 Any natural person or juridical person that is or could be held responsible for the liquidated  
5 damages towards the plaintiff, related to the detailed acts within this lawsuit.

6 Through the "making of" of this song's musical video. The plagiarized song was made with him.

7 Note that who recorded the song also has a brief appearance on the video.

8 The track from Joey 6' 1" 's "Pimp Show" song is the plaintiff' property on its entirety, since the  
9 plaintiff bought the track from Green Lantern, after paying \$6,000, for the solely purpose to use  
10 it on their "Pimp Show" song.

11 21. During the copyright's purchase and assignment agreement's granting in regards to the  
12 track, Green Lantern was represented by his manager, Ricore Shelton, back in 2009.

13 Back in 2009, Green Lantern was manager/representative agent of Shady Records Corporation.

14 This constitutes a violation of the plaintiff' copyright, guaranteed by the Constitution of the  
15 United States of America, an illegal criminal appropriation of the plaintiff' property, a copyright  
16 violation, of which the plaintiff have over the music track, a violation over the author's rights the  
17 plaintiff possess over the music track, and a clear infringement of the contractual obligations  
18 incurred with the plaintiff.

19 22. Jay Z, Lil Wayne, Dante and the other Defendants used the music track in various songs,  
20 music videos, shows, performances, promotions, illegally and in violation of the plaintiff'  
21 copyright; the copyright was sold by Green Lantern to the plaintiff; the plaintiff copyright, and  
22 so on. The defendants used the music track in various songs, not just one. Various music videos,  
23 various shows and performances, and in various promotions. Therefore, they have earned and  
24

1 generated great amounts of money, from the year 2010 up to present day. They keep on doing so,  
2 without paying the plaintiff for any participation, or any kind of compensation.

3 We will present examples of the illegal use incurred by the defendants, in regards to this music  
4 track.

5  
6 23. The song which includes the plagiarized or illegally appropriated music track was  
7 included in musical production, of which generated millions in sales and monetization. Thus, it  
8 produced millions of dollars in income, regarding the defendants Jay Z, Lil Wayne, and Dante  
9 Hawkins. Part of these incomes belong to the plaintiff, which have not received a single  
10 payment.

11 24. Spotify Facts:

12  
13 A natural or juridical person notified a plagiarism notice against Joey 6' 1" (we believe this was  
14 made by one of the defendants within the first lawsuit), or Spotify began the plagiarism  
15 complaint against Joey 6' 1" on its own. In a reckless action, Spotify did not notice the  
16 defendants about the alleged plagiarism in any way. Neither did Spotify ran an investigation in  
17 regard to the veracity of the allegation. Spotify had both songs ("Pimp Show" and "Pimp Stroll")  
18 under its domain, and it had personal knowledge of the recording and releasing dates between  
19 one song and the other. If it had not acted recklessly, Spotify could have easily distinguished that  
20 the plaintiff' song ("Pimp Show") was the original one, and that the defendants within the first  
21 lawsuit were the ones who plagiarized it, by creating and releasing "Pimp Stroll". But even then,  
22 by action or omission, they proceeded to "flag" the plaintiff' song ("Pimp Show"), in a culpable  
23 and/or reckless way, and proceeded to notify CD Baby, and other record companies, as well as  
24 other digital platforms their false and/or incorrect information and actions. With this culpable  
25 and/or reckless act, Spotify released, accelerated, or aggravated the events exposed within the  
26  
27  
28

1 first lawsuit (from which we can copy on this one). With these actions, Spotify caused serious  
2 liquidated damages to the plaintiff.

3 Notice how by unexplainable reasons, Spotify did not take any kind of action that could have  
4 affected the song "Pimp Stroll", the "Game Over" CD album, or any of the defendants within the  
5 first lawsuit.  
6

7 Keep in mind that in other judicial cases, even "Eminem" himself has stated that Spotify is a  
8 monopoly that infringes the United States of America antimonopoly laws, disastrously affecting  
9 artists.

10 25. We have emails from CD Baby undeniably proving of Spotify's culpable and/or reckless  
11 actions, that permitted for the plaintiff liquidated damages to take place.  
12

13 26. On this last email, Mrs. Kylie Regal, paralegal replies on CD Baby's representation,  
14 confirming the plaintiff were right, on an email dated on January 20, 2020. Ahead we will show  
15 CD Baby's last email we refer to, bringing things to a conclusion and solving the controversy, in  
16 our favor.  
17

18 27. For closure, Spotify takes back its decision, and informs that it will upload the song  
19 "Pimp Show" within 48 hours, and most importantly, Joey 6' 1"'s musical project; the "Sueños y  
20 Leyendas CD album.

21 28. With their culpable and reckless actions, Spotify became one of the main liquidated  
22 damages causatives towards José Ramón Cordero Ladner (Joey 6' 1"), since it was the company  
23 that wrongfully flagged him, stroked him, placed him on a "black list", and all his previous and  
24 subsequent musical productions were taken out from all digital platforms for sale and  
25 distribution, such as: CD Baby, Distrokid.  
26

27 29. Also caused a "lethal" effect, since all his videos were first blocked, and later eliminated  
28

1 from YouTube.

2 30. Clearly, with its actions Spotify caused the plaintiff a great deal of economic losses; kept  
3 them from receiving payments on You Tube; affected their flawless public reputation;  
4 irretrievably affected their artistic reputation; discredited them among the show business  
5 national/international sphere; completely cut off their artistic career; cut off and completely  
6 destroyed the commercial project they begun during 2009's last quarter, with the creation of an  
7 artistic promoter, called "WTF" (the webpage can be seen on Facebook looking it up under  
8 WTF, ever since its creation); affected his national and international artistic perception, in terms  
9 of his honesty and credibility; and worst of all, mentally and emotionally severely unsettled him  
10 in such a way he had to seek for psychiatric treatment with Dr. Juan Fumero, psychiatrist at San  
11 Juan, Puerto Rico. It also discouraged him, and took away any interest on his musical career. His  
12 emotional state has kept him from returning to his job as Legal Officer in a renowned and  
13 prestigious law firm.

14 31. Once the plaintiff finished the "Sueños y Leyendas" CD album, they registered it on CD  
15 Baby, in order for the company to be in charge of everything, regarding its sales.  
16 Ahead, various singles included within the displayed covers.

17 32. Due to CD Baby's culpable actions, in which manipulated and updated all of Joey 6' 1"  
18 musical releases illegally, as it pleased, resulting on CD Baby stealing Joey 6' 1"/s artistical  
19 identity, and made him disappear from YouTube. We believe CD Baby has done the same within  
20 all the digital platforms.

21 33. To make matters worse, CD Baby's reckless actions were committed while deliberate and  
22  
23  
24  
25  
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1 maliciously distracted with an exchange of emails from Mrs. Kylie Regal (CD Baby's paralegal)  
2 allegedly addressed to José Ramón Cordero Ladner (Joey 6' 1"), in order for him to prove that  
3 Spotify was wrong, and had not incurred on any plagiarism regarding the "Pimp Show" song.

4 34. We have evidence that shows how all of Joey 6' 1"'s musical releases were blocked, a  
5 video that shows how none of Jey 6' 1"'s posts can be heard on YouTube, and a picture that  
6 shows how all of Joey 6' 1"'s material was fully eliminated from YouTube.

7 35. Because of CD Baby's culpable and/or reckless actions of not distributing and not  
8 complying adequately with its contractual duties and responsibilities, the "Sueños y Leyendas"  
9 CD album has only paid to the plaintiff in regard to sales and monetization, the ridiculous  
10 amount of \$612.00, from 2010 to 2019. It is impossible that a CD album that includes 45 songs,  
11 10 of which Joey 6' 1" performs as solo, and 35 of these songs are with the participation of the  
12 main American Hip Hop artists and main Puerto Rican rappers (at the time), which was made at  
13 an estimated cost of \$400,000, to only generate such a ridiculously small amount on sales and/or  
14 monetization income, which is why it has to be assumed that CD Baby has illegally appropriated  
15 from the income generated by the CD album, and/or recklessly and incorrectly paid to a natural  
16 or juridical person, different from the plaintiff, whom should have been paid.

17 a. From the "Sueños y Leyendas" CD album's front cover, it can be seen the release date  
18 (May 5, 2010) which was recklessly published on YouTube, on June 7, 2015. The probability of  
19 monetization from all the CD album songs that were posted on YouTube was lost for 5 years.

20 b. It was and still is CD Baby's duty to upload "Sueños y Leyendas" CD album for sale and  
21 up until November 2019, on a reckless action, they only uploaded within the iTunes digital store,  
22 and it was not uploaded in any other digital store. José Ramón Cordero Ladner realizes the CD  
23 album is not available for sale on Spotify on December 2019. He calls out CD Baby,  
24  
25  
26  
27  
28

1 complaining in regards to this situation. That is when CD Baby uploads the “Sueños y Leyendas”  
2 CD album to Spotify’s digital store. Then, on December 2019, Spotify flags and strikes the  
3 “Sueños y Leyendas” CD album.

4 c. CD Baby, with full knowledge (since it had it registered, because it had to have it  
5 registered), that “Pimp Show” was included within the “Sueños y Leyendas” CD album and  
6 recorded on May 5, 2009, album from which release date was on May 5, 2010, and which CD  
7 Baby uploaded to YouTube on June 7, 2015 (this is shown on the CD album’s front cover, which  
8 was protected with the copyright, as shown on the CD album’s back cover). On December 2019,  
9 the song “Pimp Show” received a “strike”, and in a culpable or reckless manner, YouTube  
10 extends the strike to the full “Sueños y Leyendas” CD album, and does not defend Joey 6’ 1” in  
11 any way. At that moment, CD Baby not only does not defend Joey 6’ 1” with the information it  
12 has, but also grants credibility to Spotify’s flagging without running a previous investigation, and  
13 confronts Joey 6’ 1” with an insensitive, aggressive and threatening manner, needlessly  
14 requesting information already provided to them. It was as simple as to noticing the order of  
15 dates, and realizing that May 2009 and May 5, 2010 are prior to October 18, 2018.

16 However, CD Baby went even further, in a reckless way and included Joey 6’ 1, proceeded to  
17 fully block him, and not only deleting the 45 songs included within the “Sueños y Leyendas” CD  
18 album, but also blocked Joey 6’ 1”’s musical productions initially, and subsequently, delete them  
19 from YouTube, even if they had nothing to do with CD Baby (up to that moment, Joey 6’ 1” had  
20 a total of 75 songs), such as:

- 21 1. “La Reválida” (The Bar Exam) which includes 17 songs.
- 22 2. Several singles, included the ones of which the cover arts are displayed ahead.

1 Due to CD Baby's culpable actions, in which illegally manipulated and updated as it pleased all  
2 of Joey 6' 1"'s releases, resulted on CD Baby stealing Joey 6' 1"'s artistic identity, and made  
3 him disappear from YouTube. We believe CD Baby did the same on all digital stores.

4 36. To make matters worse, CD Baby incurred with this culpable actions, while deliberately  
5 and maliciously, distracted José Ramón Cordero Ladner (Joey 6' 1'') with email messages sent to  
6 him, to allegedly prove that Spotify was not right, and that it had not taken part on the plagiarism  
7 of the "Pimp Show" song.  
8

9 37. We have evidence which shows in sequence all of Joey 6' 1"'s released material blocked,  
10 a video that shows how none of Joey 6' 1"'s material can be heard on YouTube, and a  
11 photograph that proves Joey 6' 1'" being completely eliminated from YouTube.  
12

13 38. The defendants' plagiarism allegation's falsehood is obvious. In other words, realizing  
14 who plagiarized who becomes clear, just by analyzing the time sequence, since it is undeniable  
15 that on May 2009 (date in which the plaintiff "Pimp Show" song was recorded) is prior to  
16 October 18, 2013, date in which the defendants' "Pimp Stroll" song was recorded. "Pimp Stroll"  
17 (the result of the plagiarism) is available for sale as a single, and as part of the "Game Over" CD  
18 album, available in all national and international digital platforms, as well as in YouTube.  
19

20 39. Clearly, the sales of the song as a single, as part of the CD album, and YouTube's upload  
21 generates income and royalties to the defendants; of which not a single payment has been issued  
22 to the plaintiff. None of the topics mentioned before were notified, in any way, to the plaintiff.  
23 Moreover, the defendants falsely reported the song was plagiarized by the plaintiff on Spotify,  
24 which in turn and without verifying or running an investigation, notify this to CD Baby; neither'  
25 Spotify did not notified the plaintiff, and proceeds to flag José Ramón Cordero Ladner's (Joey 6'  
26 1'') whole CD album – not just the "Pimp Show" song, keeping it from selling in all digital stores  
27  
28



1 and platforms, as well as beforehand causing the material to be blocked and later eliminated from  
 2 YouTube. The “Pimp Show” song, as well as the “Sueños y Leyendas” CD album was kept from  
 3 generating any kind of income and monetization, such as advertisements on YouTube. It is  
 4 impossible that a CD album with the content of “Sueños y Leyendas” would not produce the  
 5 plaintiff any kind of income.  
 6

7 40. The situation goes even further, since because of the defendants’ culpable acts, Joey 6’ 1”  
 8 was placed on a “blacklist” by CD Baby, and Spotify, which blocked and avoided marketing for  
 9 musical productions previous and subsequent to the “Sueños y Leyendas” CD album, such as,  
 10 but not excluding:  
 11

- 12 • “La Reválida”: the CD album that contains 20 songs
- 13 • “Halloween 2”; single
- 14 • “Without a Oven Mitt”; single featuring Joe Budden
- 15 • “Chichaíto”; single

16 41. The identical resemblance between “Pimp Show” and Pimp Stroll” songs; it also emerges  
 17 from an email addressed to José Ramón Cordero Ladner, from one of CD Baby’s attorneys, as  
 18 shown below:  
 19

20 42. To that, José Ramón Cordero Ladner replied via email to CD Baby as shown below:  
 21 Ahead; evidence that presents how Joey 6’ 1” showed up on ASCAP, during the year 2009.

22 43. When he subscribed, and protected his songs.  
 23 Ahead; how Joey 6’ 1” was fully eliminated from ASCAP, due to the defendant’s reckless  
 24 actions.  
 25

26 This is video proof that none of Joey 6’ 1”’s songs can be played on YouTube, since they were  
 27 blocked, or fully eliminated.  
 28

1 44. "This helps us even more, because I have always had more than 1,000 subscribers MY  
2 CHANNEL has had views. They did not post this on my channel. It's blank. If they flagged my  
3 song, then why didn't they flag the one who copied Pimp Stroll? And they haven't flagged any  
4 of the other singles that I posted in my account... which are also part of my CD album...  
5 "Mañana Te Cuadro" was available in many channels, and it was never flagged. However, they  
6 do flag me."

7  
8 During mid-December of 2019, José Ramón Cordero Ladner (Joey 6' 1") sent a request to  
9 upgrade his YouTube channel.

10 YouTube replies to José Ramón Cordero Ladner's (Joey 6' 1") request with an email dated on  
11 December 24, 2019 which is displayed ahead.

12  
13 45. On December 28, 2019, YouTube notifies José Ramón Cordero Ladner's (Joey 6' 1") via  
14 email that his request has been approved. Ahead, the email is shown.

15 In regard to the previous, up until this point, everything was going along with YouTube.

16 46. Meanwhile, from January 7, 2020 to January 23, 2020 CD Bay's legal representative,  
17 Mrs. Kylie Regal (CD Baby's Paralegal/avl) kept constant communication with José Ramón  
18 Cordero Ladner (Joey 6' 1") through the previously displayed emails. On the other hand and at  
19 the same time, CD Baby kept recklessly perpetrating acts that continued to affect José Ramón  
20 Cordero Ladner (Joey 6' 1"), inappropriately and unfairly by specifically flagging two his videos  
21 on YouTube one from Slaughterhouse and the other from Joey 6' 1" performance as a solo, titled  
22 "Ella no quiere pitorro, ella quiere chichaíto". The first one is part of the "Sueños y Leyendas  
23 release, uploaded on YouTube, since the year 2015 by CD Baby itself, and the one from which  
24 specifically, the communications between José Ramón Cordero Ladner (Joey 6' 1") and Kylie  
25  
26  
27  
28

1 Regal (CD Baby's Paralegal / Avl). The second one was uploaded on YouTube on the year 2019,  
2 by Distrokid.

3 47. We found out about CD Baby's reckless acts via two emails that were sent to us,  
4 precisely by YouTube, on January 8, 2020 and January 20, 2020, which will be shown ahead.

5 48. CD Baby's actions caused the plaintiff grave and serious liquidated damages, because  
6 both videos are available, but they do not monetize tom the plaintiff.

7 49. Once again, YouTube took the action specified on both emails  
8  
9 • without previously notifying the plaintiff in any way,  
10 • without protecting them plaintiff' rights in any way,  
11 • without informing the plaintiff who specifically gave copyright to both videos,  
12 • without recognizing or give credit to the fact that both videos were already posted on  
13 YouTube years before, prior to being flagged by CD Baby  
14  
15 • not giving any credit to the yearly natural sequence  
16 • without running a previous investigation to their hazardous action  
17 • by not giving the plaintiff the chance to explain their stand, and  
18 • preventing them from defending themselves in any way.

19 50. As a matter of example, we mentioned that if in both videos Joey 6' 1" shows as lead  
20 singer, in regards to "Ella no quiere pitorro, quiere chichaíto". Joey 6' 1" is the only person that  
21 shows up in the video, and on the other video, Joey 6' 1" shows up along with all of  
22 Slaughterhouse's member. It is not possible for someone to have copyright before Joey 6' 1".  
23 We also have within our power clear and overwhelming documented evidence in which  
24 Slaughterhouse relinquishes all copyright in regards to the recorded video in which they  
25 participated with the plaintiff.  
26  
27  
28

1 51. We deem necessary to investigate regarding the video with Slaughterhouse, whether if it  
2 were the members, the manager and/or the musical producer who illegally copyrighted it;  
3 because if this is the case, this action would prompt another additional, separate and independent  
4 lawsuit against the defendants. If this action was self-motivated by CD Baby, there would be  
5 ground for a new action against CD Baby.  
6

7 52. Same thing happens with the video “A ella no le gusta el pitorro, ella quiere chichaíto;  
8 there would be ground for a new and independent cause of action against “the third party” who  
9 illegally copyrighted it, or against CD Baby, if it self-motivated to do so.

10 If we observe at what has been exposed by us throughout all our presentation within this written  
11 claim, what José Ramón Cordero Ladner (Joey 6’ 1”) has suffered seems to be the result of a  
12 malicious conspiracy from all the defendants on about 10 lawsuits against Joey 6’ 1”.

13 53. Last, we present the email sent to CD Baby, from José Ramón Cordero Ladner (Joey 6’  
14 1”) on January 26, 2020, with the purpose of obtaining additional explanatory information in  
15 regard to this whole situation. A copy of this email was also sent to YouTube to the same address  
16 from which they sent the emails mentioned previously, and the reply was “robotically” replied  
17 by YouTube. The email sent to CD Baby was in fact, received by CD Baby, and we have the  
18 confirmation notice in our power.  
19

20 Ahead, a display of José Ramón Cordero Ladner’s (Joey 6’ 1”) email sent to CD Baby.

21 This email was sent directly to CD Baby’s Paralegal, Mrs. Kyle Regal.  
22

23 54. José Ramón Cordero Ladner (Joey 6’ 1”) vs. Distrokid  
24

25 The plaintiff chose Distrokid to distribute the following musical productions:

- 26 i. La Reválida – a CD album that includes 17 songs which are property of the plaintiff. The  
27 CD album was recorded during the years 2010, 2011, and 2012; it was released for its  
28

1 distribution during the year 2018. It includes songs, such as Joey 6' 1" solo songs, as well as  
2 songs featuring with other singers.

3 ii. Without an Oven Mitt – Joey 6' 1"'s single, featuring with American singer, Joe Budden.

4 iii. We Reppin Puerto Rico – Joey 6' 1"'s single, featuring American singer Royce da 5' 9"

5  
6 55. At the time in which Joey 6' 1"'s musical releases were delivered to Distrokid for their  
7 distribution, these were first blocked and later deleted from YouTube. According to what is  
8 exposed on the following photographs, Distrokid never made the required diligences to protect  
9 the artist and did not even notified him in regard to the ongoing situation. It was Distrokid's  
10 responsibility to seek for the success of these releases, in regard to their distribution and income  
11 production, as well as their monetization. This was and still is Distrokid's sole and absolute  
12 responsibility. However, Distrokid remained silent, and in a reckless manner, did not prevent  
13 Spotify's and CD Baby's reckless actions against the plaintiff.  
14

15 Distrokid caused the plaintiff serious and grave liquidated damages.

16 56. There is also a probability that would make Distrokid even more responsible, since it was  
17 Distrokid they one that blocked and eliminated from YouTube the musical productions it had in  
18 charge, which were mentioned, previously. It should be alleged a lawsuit as an alternative, even  
19 though it is less likely.  
20

21 57. Previous to this controversy, Distrokid allowed José Ramón Cordero Ladner (Joey 6' 1'")  
22 to log in into the webpage without any limitation or requirements to monitor everything  
23 regarding the musical productions' course, sales, and monetization, if any, which were delivered  
24 to Distrokid for their distribution, promotion, and digital sales previously mentioned.  
25

26 58. However, on mid-January 2020 Distrokid recklessly starts to treat José Ramón Cordero  
27  
28

1 Ladner's (Joey 6' 1") as an "foreigner" [even though José Ramón Cordero Ladner (Joey 6' 1") is  
 2 an American citizen, who lives in Puerto Rico, which is part of the United States of America], by  
 3 requiring him to fill out the W-8ben form which is only required for foreign people. This  
 4 constitutes a clear violation to the equal law protection clause, protected by the Constitution of  
 5 the United States of America, which also presents a clear act of xenophobia.

6 Said document was sent the first time to José Ramón Cordero Ladner (Joey 6' 1") by Distrokid.

7  
 8 59. The purpose of this attachment is to expose the list of musical releases delivered to  
 9 Distrokid by José Ramón Cordero Ladner (Joey 6' 1") for their distribution in digital platforms.  
 10 Distrokid had the obligation to protect these musical productions, and it failed to do so. José  
 11 Ramón Cordero Ladner's (Joey 6' 1") musical productions musical productions that were  
 12 flagged, blocked, and included within a "black list" were the following:  
 13

- 14 1. La Reválida – CD album that includes 20 songs
- 15 2. Without a Oven Mitt – single, featuring Joe Budden
- 16 3. Puerto Rico (featuring Royce Da 5' 9")
- 17 4. When I go. They go (featuring Chacity & Cyborg)
- 18

19 60. ASCAP is an organization that is dedicated to release all sorts of musical productions  
 20 among others, protect all the organization's members (in other words, all of those that subscribe  
 21 to it). ASCAP is mainly focused on protecting its members' copyright and ownership rights.  
 22 ASCAP also collects royalties generated by the members' musical productions, and each one of  
 23 them receives money from this, which is a big aspect for artists like Joey 6' 1".

24 José Ramón Cordero Ladner (Joey 6' 1") became ASCAP member in 2009, as shown below.  
 25 During that same date, he uploaded his musical production, titled "Sueños y Leyendas", in order  
 26  
 27  
 28

1 for ASCAP to protect it, and for ASCAP to collect royalties, monetization, which in turn would  
2 be delivered to José Ramón Cordero Ladner (Joey 6' 1").

3 61. We have evidence of how Joey 6' 1" showed up on ASCAP during the year 2009,  
4 when he subscribed, and protected his songs.

5 Ahead, due to ASCAP's reckless action, Joey 6' 1" was fully eliminated from ASCAP, after  
6 receiving information from the defendants on the previous lawsuits.

7 62. We do not know why on a reckless manner, ASCAP only kept this song protected,  
8 and eliminated that protection for the other 44 songs included within the "Sueños y Leyendas"  
9 album. "Mañana Te Cuadro is one of the 45 songs included within Joey 6'1 "Sueños y  
10 Leyendas" musical production. We own agreements within our power that state the track, as well  
11 as the "Mañana Te Cuadro" song are sole and exclusive plaintiff property. The assumption that  
12 ASCAP, recklessly, paid J-King and Maximan all the corresponding payments for the "Mañana  
13 Te Cuadro" song, without making José Ramón Cordero Ladner (Joey 6' 1") a single payment is  
14 most probable. It is well known by the public that "Mañana Te Cuadro" was a big hit, which had  
15 to and still does make millions of sales, and generates great income, and all sorts of  
16 monetization. It is a crystal clear "law" principal that "he who pays poorly, pays twice". Which  
17 is why ASCAP must pay José Ramón Cordero Ladner (Joey 6' 1") all that has not paid, in terms  
18 of sales and royalties' income, generated by the song "Mañana Te Cuadro".

19 63. ASCAP also has to reply to the plaintiff, in regard to the reckless acts of having  
20 Illegally and unfairly deprived its protection to the remaining 44 songs of the "Sueños y  
21 Leyendas" musical production.

22 64. In eleven years, ASCAP addressed José Ramón Cordero Ladner (Joey 6' 1") a letter  
23  
24  
25  
26  
27  
28



1 for the first time. A letter received on January 23, 2020, regarding “Sueños y Leyendas”, his  
2 musical production. Basically, ASCAP acknowledges their unfulfilled responsibility within the  
3 letter’s content.

4 65. Naturally, as a matter of common sense, the plaintiff have not replied in any way to  
5 any of the letters, and they have not made any effort in making the faulty diligence, solicited by  
6 ASCAP.  
7

8 It is necessary to reaffirm and reassure the fact that ASCAP has not made a single payment to the  
9 plaintiff, ever.

10 66. The true names and capacities, whether individual, corporate, or otherwise, of the  
11 defendants sued as Does 1 through 100 are unknown to Plaintiff, who, therefore, sues them by  
12 such fictitious names. At such time as their true names and capacities have been ascertained,  
13 Plaintiff will seek leave of Court to amend this Complaint accordingly. On information and  
14 belief, Plaintiff alleges that each of Does 1 through 100 was the agent, representative, or  
15 employee of each of the other Defendants and was acting at all times within the scope of his/her  
16 agency or representative capacity, with the knowledge and consent of the other Defendants, and  
17 that each of Does 1 through 100 are liable to Plaintiff in connection with one or more of the  
18 claims sued upon here and are responsible in some manner for the wrongful acts and conduct  
19 alleged here.  
20  
21

#### 22 JURY DEMAND

23 Plaintiff demands a jury trial of all issues triable to a jury in this matter.  
24

#### 25 PRAYER FOR RELIEF

26 WHEREFORE plaintiff prays for relief as follows:  
27  
28

1           A.     Declaring that Defendants' unauthorized conduct violates Plaintiff Joey 6'1 rights  
2 under common law and the Federal Copyright Act;

3           B.     Immediately and permanently enjoining Defendants, their officers, directors,  
4 agents, servants, employees, representatives, attorneys, related companies, successors, assigns,  
5 and all others in active concert or participation with them from, copy infringements, copying and  
6 republishing any of Plaintiff' copyrighted intellectual property or copyrighted material without  
7 consent or otherwise infringing Plaintiff Joey 6'1 copyrights or other rights in any manner;

8           C.     Ordering Defendants to account to Plaintiff Joey 6'1 for all gains, profits, and  
9 advantages derived by Defendants by their infringement of Plaintiffs copyrights or such damages  
10 as are proper, and since Defendants intentionally infringed Plaintiffs copyrights, for the  
11 maximum allowable statutory damages for each violation;

12           D.     Awarding Plaintiff actual and/or statutory damages for Defendants' copyright  
13 infringement in an amount to be determined at trial;

14           E.     That defendants, their directors, officers, agents, representatives, subsidiaries, and  
15 affiliates and all persons acting by, through, or in concert with any of them, be permanently  
16 enjoined from:  
17

18               1) using and infringing the copyrighted expression of plaintiff in any manner, and from  
19 reproducing, exhibiting, transmitting, displaying, distributing, or preparing derivative  
20 works from all copyrighted material in the Copyrighted Music;

21               2) using or infringing the intellectual Property of the Plaintiff Joey 6'1 of the song Pimp  
22 Show and the track used in this song, or using any other Intellectual Property confusingly  
23 similar to the intellectual Property of Plaintiff Joey 6'1 in connection with the marketing,  
24 display or distribution of any defendants merchandise;  
25  
26  
27  
28

1 3) using any false designation of origin or false description which can or is likely to lead  
2 the public, or individual members thereof, erroneously to believe either that any  
3 Intellectual Property of Plaintiff Joey 6'1 of songs, CD, videos or related merchandise or  
4 service was prepared, offered for sale, licensed, sponsored, endorsed, or authorized by the  
5 Defendants, when such is not the case; and  
6

7 4) assisting, aiding, or abetting any other person or entity in engaging in or performing  
8 any of the activities referred to in subparagraphs (1)–(3) above;  
9

10 F. That defendants be required to pay to the Plaintiff Joey 6'1 all damages it has sustained as a  
11 result of defendants' copyright infringement pursuant to 17 U.S.C. § 504;  
12

13 G. That defendants be required to account for and disgorge to the Plaintiff Joey 6'1 all gains,  
14 profits, and advantages derived from their copyright infringement pursuant to 17 U.S.C. § 504;  
15

16 H. That defendants be required to pay the Plaintiff Joey 6'1 statutory damages and an increase in  
17 the award of statutory damages due to defendants' willful infringement pursuant to 17 U.S.C. §  
18 504;

19 I. That defendants be required to pay Plaintiff Joey 6'1 all such costs and reasonable attorneys'  
20 fees as are warranted;

21 J. That defendants be required to pay Plaintiff Joey 6'1 for only the emotional damages  
22 warranted under the US Federal Law that individually each Defendant the minimum amount  
23 should be \$10,000,000.00 (Ten Million Dollars)  
24

25 K. That the Court enter judgment for the Plaintiff Joey 6'1 and against defendants for all claims,  
26 including pre- and post-judgment interest, as allowed by law;  
27  
28

1 L. That the Court enter judgment against defendants finding that their unlawful copying of the  
2 Copyrighted song Pimp Stroll and the track of the song Pimp Stroll that is intellectual property of  
3 Joey 6'1 was and is willful;

4 M. That defendants be ordered to pay of Plaintiff Joey 6'1 its costs in this action along with  
5 reasonable attorneys' fees; and  
6

7 N. That Plaintiff Joey 6'1 be granted such other relief as is just and equitable.

8 O. Awarding Plaintiff such other and further relief as is just and proper.

9 P. For punitive damages according to proof at time of trial.  
10

11 Date: January 7, 2021.

12 Respectfully,  
13

14   
15 Susan Marie Cordero-Ladner  
16 Attorney

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27  
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